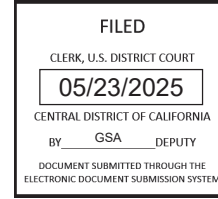


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IN PRO PER



**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA,
WESTERN DIVISION**

TODD R. G. HILL, pro se,

Case No.: 2:23-cv-01298-JLS-BFM

Plaintiff(s),

The Hon. Josephine L. Staton

Courtroom 8A, 8th Floor

vs.

Magistrate Judge Brianna Fuller Mircheff

Courtroom 780, 7th Floor

THE BOARD OF DIRECTORS, OFFICERS
AND AGENTS AND INDIVIDUALS OF THE)
PEOPLES COLLEGE OF LAW; THE GUILD)
LAW SCHOOL, a CALIFORNIA)
CORPORATION doing business as THE)
PEOPLES COLLEGE OF LAW; CHRISTINA)
MARIN GONZALEZ, ESQ.; HECTOR C.)
PENA; ROBERT IRA SPIRO, ESQ.; JUAN)
MANUEL SARINANA, ESQ.; PREM SARIN;)
DAVID TYLER BOUFFARD; JOSHUA)
GILLENS, ESQ.; CLEMENTE FRANCO,)
ESQ.; HECTOR SANCHEZ; PASCUAL)
TORRES, ESQ.; CAROL DEUPREE; GARY)
SILBIGER, ESQ.; EDITH POMPOSO;)
ADRIANA ZUNIGA NUNEZ; ROGER)
ARAMAYO; WILLIAM MAESTAS, ESQ.;)
ISMAEL VENEGAS)

Defendant(s).

DEMAND FOR JURY TRIAL

Unlimited Civil Case

**FOURTH~~CORRECTED PROPOSED~~
FIFTH AMENDED COMPLAINT FOR
DAMAGES, DECLARATORY &
INJUNCTIVE RELIEF ARISING FROM:**

H.I. CIVIL RICO CLAIM - DAMAGES
UNDER THE RACKETEER INFLUENCED
AND CORRUPT ORGANIZATIONS ACT
(18 U.S.C. § 1961 et seq.)

H.II. VIOLATION OF THE UNRUH CIVIL
RIGHTS ACT (CALIFORNIA CIVIL CODE
§ 51) DISCRIMINATORY CONDUCT
AND DAMAGES

H.III. NEGLIGENCE AND NEGLIGENCE
PER SE - BREACH OF DUTY
RESULTING IN HARM

IV. ~~NEGLIGENT HIRING, RETENTION, AND SUPERVISION - FAILURE TO IMPLEMENT PROPER SAFEGUARDS~~

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I. PREFACE

P1. Pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiff respectfully submits this Fifth Amended Complaint to clarify and supplement existing causes of action in light of pending motions to dismiss, without prejudice to the Court's forthcoming ruling on Plaintiff's concurrently pending Federal Rule of Civil Procedure 59(e) motion (Docket 262), which also permits a motion to alter or amend a judgment..

P2. This Fifth Amended Complaint is submitted in response to arguments raised in Defendants' pending motions to dismiss under Federal Rule of Civil Procedure 12(b)(6), without waiver of Plaintiff's position that the operative Fourth Amended Complaint satisfies the notice pleading standard under Rule 8(a). Plaintiff further preserves objections to any application of an improperly heightened pleading burden inconsistent with *Swierkiewicz v. Sorema N.A.*, 534 U.S. 506 (2002); *Ashcroft v. Iqbal*, 556 U.S. 662 (2009); and *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007). Plaintiff also objects to any disregard of the Ninth Circuit's mandate that *pro se* pleadings be liberally construed, particularly in civil rights actions. See *Hebbe v. Pliler*, 627 F.3d 338, 342 (9th Cir. 2010); *Erickson v. Pardus*, 551 U.S. 89, 94 (2007).

P3. This Fifth Amended Complaint arises from a sustained pattern of academic fraud, regulatory evasion, and retaliatory conduct carried out by Peoples College of Law (PCL), its administrators, and co-conspirators, with the knowledge and passive complicity of the State Bar of California. The conduct described herein includes the manipulation of Plaintiff's academic transcript, obstruction of licensure pathways, and calculated governance failures that harmed Plaintiff's legal education, bar eligibility, and professional prospects.

P4. Plaintiff notes that this complaint is filed while his Rule 59(e) motion remains pending before the Court, challenging prior irregularities including selective docketing and premature dispositive rulings. This complaint is limited to the four operative causes of action currently before

1 the Court and is submitted without waiver of the issues preserved in Plaintiff's Rule 59(e) motion.
2 Plaintiff further preserves his objection to the post-dismissal filing of Docket 308 by the State Bar
3 of California, which was procedurally unauthorized. This amendment is submitted solely to address
4 pending motions and without waiver of claims previously asserted in the Fourth Amended
5 Complaint.

6
7 P5. This amendment is submitted in good faith to promote judicial efficiency and eliminate
8 any ambiguity that might otherwise delay resolution of substantive issues. Plaintiff expressly
9 reserves all rights arising from the procedural posture of the case, including the impact of any
10 irregularities in docketing and premature dispositive rulings on unresolved motions for judicial
11 notice and reconsideration.

12 13 **II. IDENTIFICATION OF PARTIES**

14 1. **PLAINTIFF.** Plaintiff Todd R.G. Hill ("Plaintiff" or "Todd") is an African American adult
15 residing in Belton, Texas with an ADA-recognized disability.

16 **2. DEFENDANTS:**

17
18 3. Peoples College of Law ("PCL") was the dba of the Guild Law School, a non-profit
19 corporation. PCL operated as an unaccredited fixed-facility law school in Los Angeles,
20 California, subject to regulation by the State Bar of California. PCL offered legal education
21 services to in-state and out-of-state students via the Internet until its charter was revoked for
22 protracted non-compliance effective May 31, 2024.

23 3A. The Board of Directors of Peoples College of Law is named herein as a defendant to the
24 extent it acted as a collective decision-making body that authorized, ratified, or failed to
25 intervene in the conduct alleged in this Complaint. Where applicable, Plaintiff seeks relief
26 against both the board as an institutional component of the PCL corporate entity and against its
27 individual members as named defendants in their personal and official capacities.
28

- 1 4. Christina Marin Gonzalez, Esq. (“Gonzalez”) was the President of PCL and is a PCL
2 graduate.
- 3 5. Hector C. Pena (“Pena”) is a PCL graduate and has served as President and Board Treasurer.
- 4 6. Robert Ira Spiro, Esq. (“Spiro”) was the Dean of PCL and has served in various roles,
5 including corporate counsel.
- 6 7. Juan Manuel Sarinana, Esq. (“Sarinana”) was an adjunct professor and Dean of PCL.
- 7 8. Prem Sarin (“Sarin”) based on personal experience and credible report is an individual and
8 PCL graduate who has served as a PCL Board Member from November 2021 and times
9 relevant to this matter.
- 10 9. David Tyler Bouffard (“Bouffard”) based on information and belief has served as a PCL
11 Board Member from November 2021 and times relevant to this matter.
- 12 10. Joshua Gillens, Esq. (“Gillins”) based on information and belief is an individual and PCL
13 graduate who has served as a PCL Board Member from November 2021 to and times
14 relevant to this matter.
- 15 11. Clemente Franco, Esq. (“Franco”) based on information and belief has served as a PCL
16 Board Member from November 2021 to the present and as Treasurer.
- 17 12. Hector Sanchez (“Sanchez”) based on information and belief has past served as a PCL
18 Board Member and has engaged in conduct relevant here from November 2021 and times
19 relevant to this matter.
- 20 13. Pascual Torres, Esq. (“Torres”) based on credible report is an individual associated with PCL
21 having served as Dean of the law school for a brief tenure in 2022.
- 22 14. Carol Deupree (“Deupree”) based on experience and credible report has served as a PCL
23 Board Member from November 2021 and times relevant to this matter.
- 24
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1 15. Gary Silbiger, Esq. (“Silberger”) based on information and belief is a co-founder of PCL
2 who has served as a Board Member at various times from 2018 to the present.

3 16. Edith Pomposo, (“Pomposo”) is an individual associated with PCL. Pomposo served as
4 Dean of the law school in 2022.

5 17. Adriana Zuniga Nunez (Zuniga) is an individual associated with PCL in her former capacity
6 as PCL's paid Registrar.

7 18. Roger Aramayo (“Aramayo”) is an individual associated with PCL in his capacity as PCL's
8 paid Registrar in 2023.

9 19. William Maestas, Esq. (“Maestas”) based on information and belief is a co-founder and
10 graduate of PCL. Maestas has served as a Board Member at various times from at least 2018
11 to the present.

12 20. Ismael Venegas (“Venegas”) is an individual associated with PCL in his capacity as PCL's
13 Treasurer based on personal experience and credible evidence.

14
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17
18 **21. STATE BAR, OFFICIALS AND REGULATORY AGENTS:**

19 22. The State Bar of California is a public corporation and state regulatory agency under the
20 jurisdiction of the California Supreme Court, with responsibilities to regulate the practice of
21 law in California and to protect the public by ensuring that attorneys comply with the state's
22 ethical standards. The State Bar, acting as an administrative arm of the state, is responsible
23 for regulating legal education, accrediting law schools, and overseeing the legal profession
24 in California. The following individuals are current or former employees or affiliates of the
25 State Bar of California (“State Bar”), not named as Defendants, but identified as persons
26
27
28

1 with knowledge or involvement through communications, documentation, or organizational
2 privity:

3 23. Natalie Leonard (“Leonard”) is an active licensee and Principal Program Analyst at the State
4 Bar of California, responsible for law school regulation and was the primary contact for PCL
5 compliance issues.

6
7 24. Leah Wilson, Esq. (“Wilson”) is an active licensee and individual employed as the Executive
8 Director of the State Bar.

9 25. Audrey Ching (“Ching”) is an active licensee and Director of the Office of Admissions of
10 the State Bar and is responsible for law school regulation and staff oversight.

11
12 **H.III. BASIS FOR JURISDICTION AND VENUE**

13 26. This action arises under the Racketeer Influenced and Corrupt Organizations Act (RICO), 18
14 U.S.C. §§ 1961-1968^{2,3}, and supplemental jurisdiction is invoked over related state-law
15 claims pursuant to 28 U.S.C. § 1367.

16
17 27. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question
18 jurisdiction) and 28 U.S.C. § 1367 (supplemental jurisdiction). Additionally, jurisdiction is
19 proper under 28 U.S.C. § 1332 (diversity jurisdiction) because Plaintiff Todd Hill is
20 currently a resident and citizen of the State of Texas, while Defendants predominantly reside
21 and conduct business within the State of California, creating complete diversity among the
22 parties.

23 27A. Plaintiff affirms that jurisdiction is properly asserted under 28 U.S.C. § 1331, as the claims
24 arise under federal law, including the Racketeer Influenced and Corrupt Organizations Act
25 (RICO), 18 U.S.C. §§ 1961–1968, and 42 U.S.C. § 1983. Pendant state law claims fall within
26 the Court’s supplemental jurisdiction under 28 U.S.C. § 1367(a).
27
28

1 Notably, Defendants' objection based on a purported lack of complete diversity under 28
2 U.S.C. § 1332 is inapposite. While Plaintiff does not rely on diversity jurisdiction, there is no
3 evidence before the Court establishing that complete diversity does not exist. As such, even if
4 federal question jurisdiction were not dispositive, diversity jurisdiction is not affirmatively
5 barred.

6 Regardless, because Plaintiff's claims arise under federal statutes and involve questions of
7 federal law, jurisdiction is properly conferred under § 1331.

8 28. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)) because many of the events
9 or omissions giving rise to the claims occurred in this District, and the Defendants are
10 predominantly located within this judicial district.
11

12 ~~III~~.IV. TERMINOLOGY AND DEFINITIONS

13 29. "The Board of Directors" refers to the governing body of the Peoples College of Law,
14 responsible for overall management and strategic direction.
15

16 30. "Officers" refers to individuals holding executive positions within the institution, including
17 roles such as President, Dean, and other senior administrators.
18

19 31. "Agents of the Peoples College of Law" encompasses individuals or entities acting on behalf
20 of or under the institution's authority, including faculty, staff, and contractors.
21

22 ~~IV~~.V. STATE BAR REGULATORY POSTURE LIMITED STUDENT 23 RECOURSE

24 32. **State Action and Role Under Color of Law:** At all times relevant to this action, the **State**
25 **Bar of California** was acting under color of state law. As a state entity, its employees,
26 agents, and officers—acting in their official and personal capacities—participated in
27 decisions and actions that directly affected Plaintiff's legal education and career progression.
28

1 33. The State Bar of California operates under a "non-interference" policy in student disputes
2 with law schools, as outlined in Guideline 1.6 of the Guidelines for Unaccredited Law
3 School Rules (GULSR~~7~~). As early as December 10, 2021, the State Bar communicated its
4 'non-interference' policy to Todd, stating that it did not intervene in disputes between
5 students and their law schools.
6

7 33A. Plaintiff has statutory standing under 18 U.S.C. § 1964(c) because he has suffered injury to
8 business and property by reason of the defendants' pattern of racketeering activity. He also
9 alleges injury under the Bane Act (Cal. Civ. Code § 52.1) based on coercive and retaliatory
10 conduct designed to chill his exercise of civil rights protected under federal and state law.
11

12 **V.VI. PCL'S PERSISTENT NON-COMPLIANCE AND EXPLOITATIVE**
13 **PRACTICES**

14 34. PCL was the owner of the property located at 660 N. Bonnie Brae in Los Angeles, CA, held
15 in fee simple absolute ownership and full control over the premises, as confirmed by
16 property records for all times relevant to this cause of action.
17

18 35. From at least 2017, PCL has been engaged in a pattern of non-compliance with State Bar
19 regulations related to record-keeping, grading, attendance policies, and scholastic standards.
20 This pattern was documented during the January 2020 inspection conducted by Heather
21 Georgakis, Educational Standards Consultant to the Committee of Bar Examiners (CBE),
22 which identified numerous deficiencies including PCL's failure to accurately maintain
23 student attendance records, reliance on unauthorized grading practices, and inadequate
24 measures to ensure the integrity of student work. The inspection also revealed PCL's lack of
25 sufficient administrative capacity to achieve compliance with CBE standards due to
26 inconsistent record-keeping and inadequate policies for grade review and advancement.
27
28

1 36. PCL collected tuition from students, including Plaintiff, without compensating instructors,
2 who were induced to provide their services under representations that their efforts would
3 support a social justice-oriented, non-profit law school. Despite this representation, PCL
4 actively recruited students from underrepresented communities, targeting individuals from
5 disadvantaged backgrounds with limited access to legal services. The school's marketing,
6 including statements on its website, emphasized advocacy for marginalized groups, while
7 concurrently failing to address the institutional deficiencies identified by the CBE inspection
8 and other grievances submitted by students.
9

10 37. After Plaintiff successfully passed the First-Year Law Students' Examination (FYLSE) in
11 June 2020, he received transcripts from PCL that contained numerous errors, including
12 incorrectly calculated class unit awards and missing required information. Despite Plaintiff's
13 repeated efforts to rectify these errors and ensure compliance with State Bar regulations, his
14 efforts were obstructed by Defendants Gonzalez, Pena, Spiro, and Leonard. On July 8, 2022,
15 despite Plaintiff's good academic standing, Defendant Spiro, on behalf of PCL, informed
16 Plaintiff that PCL would not provide the required fourth-year courses necessary for him to
17 graduate. The delay in Plaintiff's education occurred while PCL continued to solicit tuition
18 payments and present itself as compliant with State Bar standards.
19

20 38. PCL's adherence to a non-compliance policy that discouraged student grievances from
21 reaching external regulatory bodies is further demonstrated by its administration's
22 introduction of retroactive rules aimed at students who attempted to file complaints. Todd
23 Hill received an email from student Kevin Clinton on March 21, 2022, indicating ongoing
24 issues with grade uploads and administration's refusal to rectify transcript errors.
25 Additionally, proposed PCL Student Handbook provisions discouraged or prohibited
26 students from directly contacting the State Bar with complaints, instead funneling concerns
27
28

1 through internal channels. This policy change was intended to silence student grievances and
2 prevent external regulatory scrutiny. (See Exhibit 4 - Email Exchange from Kevin Clinton
3 Indicating Grade Upload Issues, March 21, 2022).

4 39. PCL continued to operate despite documented grievances and inspection reports detailing its
5 persistent non-compliance with State Bar regulations. The school's practices, including the
6 solicitation of tuition payments while failing to comply with mandated record-keeping,
7 grading standards, and administrative policies, reflect ongoing disregard for established
8 regulations. PCL administrators, including Defendants Spiro, Pena, and Bouffard, engaged
9 in improper financial practices by making repeated and unlawful tuition demands, as
10 evidenced by emails related to tuition charges and collections dated March 2022. For
11 example, Defendant Bouffard demanded payment for tuition despite Plaintiff's pre-existing
12 financial agreements allowing credits against tuition charges and State Bar policies
13 prohibiting fee collection from non-compliant institutions. These communications
14 demonstrate an ongoing pattern of fraudulent billing and coercive tactics aimed at extracting
15 tuition payments from students. (See Exhibit 5 - March 2022 Email Related to Unlawful
16 Tuition Charges and Collection).

17 40. Despite PCL's long-standing non-compliance, the school expanded its class size without
18 addressing existing deficiencies, exacerbating disparities in academic support and
19 administrative oversight. PCL's recruitment of out-of-state students attending remotely,
20 failure to provide proper and timely disclosures, maintenance of inaccurate records, and
21 misrepresentation of its compliance status all contributed to a cycle of failure
22 disproportionately affecting African American students. PCL's failure to comply with Rule
23 2.3(D) and Rule 9.1 regarding oversight of record-keeping processes directly impacted
24
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1 Plaintiff's ability to transfer or receive accurate transcripts, thereby obstructing his
2 educational progress.

3 41. PCL's failure to provide necessary academic resources, maintain accurate records, and
4 ensure compliance with educational standards disproportionately harmed African American
5 students. The school's attrition rate for African Americans exceeded 90% since at least 2017,
6 with fewer than 1 in 10 entrants ultimately receiving a degree. This was exacerbated by
7 PCL's decision to expand enrollment without addressing existing compliance deficiencies.

8 42. Based on State Bar and PCL documents, as early as 2017 and unbeknownst to Plaintiff at
9 time of matriculation PCL's failure to timely report, provide or maintain accurate records
10 resulted in ongoing non-compliance with State Bar rules and guidelines. (See Exhibit 5).

11 43. In the Fall of 2019, Plaintiff enrolled at PCL, an unaccredited fixed-facility law school in
12 Los Angeles, California with the goals of earning a Juris Doctorate, preparing to sit for the
13 bar exam and embarking on a new career.

14 44. Plaintiff paid application fees and tuition through checks, ACH bank or wire transfers or
15 through money transfer services such as Zelle.

16 45. On credible report and belief, Todd was one of five African Americans in his 1L class; two
17 males and three females, in a cohort of 22.

18 46. The State Bar Act of 1927 established the State Bar's regulatory authority and scope of its
19 duties. The State Bar Act is codified in the California Business & Professions Code Div. 3 -
20 Professions and Vocations Generally, Ch. 4 - Attorneys (Bus. & Prof. Code 6000 et seq.).
21 The plaintiff believes on credible report that the State Bar rules and guidelines are
22 regulations for purposes of Government Code 11342.600 and govern the operation of
23 unaccredited law schools.

24 47. State Bar conducted an inspection of PCL in January of 2020.

1 48. The 2020 Inspection Report, prepared by Heather Georgakis, Educational Standards
2 Consultant to the Committee of Bar Examiners (CBE), outlined numerous areas of non-
3 compliance by Peoples College of Law (PCL) with the Unaccredited Law School Rules.
4 Conducted from January 14–16, 2020, the inspection identified deficiencies related to
5 recordkeeping, scholastic standards, attendance policies, and grading procedures. Among
6 other issues, the report noted the failure of PCL to accurately maintain student attendance
7 records, reliance on unauthorized grading practices, and inadequate measures to ensure the
8 integrity of student work. Additionally, the inspection revealed PCL's lack of sufficient
9 administrative capacity to achieve compliance with CBE standards, as evidenced by
10 inconsistent record-keeping and inadequate policies for grade review and advancement.
11 Despite efforts by PCL to remedy some issues, the report underscores the persistent
12 challenges facing the institution, particularly in maintaining accurate records, ensuring
13 compliance with state regulations, addressing academic administrative deficiencies and
14 meeting basic regulatory requirements.
15

16
17 49. Plaintiff was subsequently elected to serve on the Community Board and served as Secretary
18 of the College.

19 50. In June 2020, Plaintiff was one of two PCL students, and the only African American in his
20 cohort, to successfully pass the First-Year Law Students' Examination (FYLSX).

21 51. After passing the FYLSX, Plaintiff received copies of his transcripts, which contained
22 numerous errors, including incorrectly calculated class unit awards and missing required
23 information.
24

25 52. On May 7, 2021, PCL's Board, including Dean Ira Spiro and Board President Christina
26 Gonzalez, holds a fundraiser, promising that "100% of proceeds" will be used for student
27 needs. However, subsequent internal communications reveal that funds were diverted for
28

1 unrelated purposes. (See Exhibit 8 email exchange between Spiro, Pena and Gonzalez,
2 detailing the “Donor Call Squad” and fundraising-related activities.)

3 53. In June 2021, a formal grievance was submitted to the PCL Board of Directors by a first-
4 year law student (1L), Nancy Popp.

5 54. The grievance detailed concerns about the school's operations, including inaccurate grading,
6 lack of transparency in governance, and inconsistent instruction. It also highlighted failures
7 to comply with the California State Bar's Guidelines for Unaccredited Law Schools.

8 55. This grievance letter was shared with the State Bar as part of its ongoing review of PCL's
9 compliance.

10 56. On August 2, 2021, Spiro sends an email to the PCL Board stating the State Bar instructed
11 him not to retroactively change unit allocations on transcripts without CBE approval.

12 57. On August 3, 2021, Spiro emails Leonard confirming their conversation about PCL's unit-
13 credit issue. Leonard does not issue a school-wide clarification.

14 58. Plaintiff requested immediate assistance from the State Bar, as student and officer of PCL, in
15 reliance on their statutory mandate, status as monopoly regulator and public DEI statements.

16 59. October 4–15, 2021, Plaintiff is elected to the PCL Board through a community vote. Peña
17 challenges the legitimacy of Hill's candidacy, initiating a questionable review process.

18 60. **Retaliatory Governance Actions and Institutional Mismanagement:** On November 14,
19 2021, Christina Gonzalez, President of the PCL Board of Directors, submitted her
20 resignation letter, attributing her resignation to discord allegedly caused by Plaintiff Todd
21 Hill. Gonzalez's letter reflects internal animus and efforts by PCL's leadership to
22 marginalize Plaintiff's influence within the institution. This letter is attached as part of
23 Exhibit 8.
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1 **61. Notice of Board Meeting and Governance Manipulation:** On November 21, 2021,
2 Christina Gonzalez sent an email titled “PCL Notice - Board Meeting November 21, 2021”
3 announcing a PCL Board meeting. This email was sent just days after her resignation letter,
4 evidencing continued institutional discord and an attempt to reassert control over PCL’s
5 governance structure in response to Plaintiff’s advocacy efforts. This email, along with the
6 attached resignation letter, further demonstrates a pattern of retaliatory conduct aimed at
7 undermining Plaintiff’s ability to participate meaningfully in PCL’s governance. This email
8 is attached as part of Exhibit 8.

10 **62. Blocking Access to Class (March 15, 2022):** On March 15, 2022, PCL student and
11 purported board member Sarin, acting under the direction of Bouffard, who claimed to be
12 acting under the authority of then PCL President Peña, actively prevented Plaintiff from
13 accessing his classes by blocking his Zoom access. This action occurred following a series
14 of emails regarding tuition disputes and class access issues. (See Exhibit 8 - Emails related
15 to class access and tuition disputes dated March 10, 2022, and March 14, 2022.).

17 **63. Failure to Provide Required Fourth-Year Curriculum:** On June 7, 2022, Todd Hill
18 formally notified PCL, via email to Dean Spiro and the Board, that the school was failing to
19 provide the mandated fourth-year (4L) curriculum of 270 instructional hours necessary for
20 his graduation. PCL’s failure to comply with its promises caused delays in Hill’s academic
21 progress.

23 **64.** On July 8, 2022, despite Plaintiff’s good academic standing, Spiro, on behalf of PCL,
24 emailed Plaintiff to inform him that PCL would not provide the required fourth-year courses
25 necessary for him to graduate.

26 **65.** On July 20, 2022, the State Bar issued a formal Notice of Noncompliance to PCL, detailing
27 18 specific violations of the Rules for Unaccredited Law Schools.
28

1 66. On August 31, 2022, PCL belatedly submitted an application for Plaintiff's Special
2 Circumstance Exemption to the State Bar. However, Dean Spiro intentionally withheld
3 Plaintiff's medical disability records and information related to PCL's alleged misconduct,
4 despite Plaintiff having provided information for the purpose of supporting his petition. This
5 act of concealment resulted in the denial of the application, thus exacerbating the injury to
6 Plaintiff.
7

8 67. On September 1, 2022, Natalie Leonard of the State Bar formally denied Plaintiff's Special
9 Circumstance Exemption request, citing insufficient documentation. Leonard's response did
10 not consider Plaintiff's disability or the misconduct of PCL and Spiro in failing to submit the
11 necessary materials.
12

13 68. In December 2022, The Committee of Bar Examiners (CBE) places PCL on probation,
14 requiring monthly reports on compliance improvements.
15

16 69. In December 2022, Plaintiff filed a Government Claims Act Form ("GCAF") obtained from
17 the State Bar's web site with copies of a draft complaint. No response was received.
18

19 70. On March 22, 2023, a letter from PCL Dean Pomposo acknowledging PCL's violation of
20 Rule 4.241 promised refunds to affected students, but failing to follow through.
21

22 71. PCL's Ultimate Closure Due to Non-Compliance: On May 31, 2024, PCL's charter to
23 operate as a law school was permanently revoked due to longstanding and intractable
24 noncompliance. PCL was forced to shut down. While this validated Hill's allegations about
25 PCL's unfitness, it caused significant personal harm, as his alma mater ceased to exist,
26 complicating his ability to obtain his degree or finalize his education.
27

28 72. On August 13, 2024, Plaintiff submitted an additional GCAF for which response was
received September 6, 2024, for damages related to this complaint.

1 72A. Plaintiff has satisfied all applicable notice requirements under the California Government
2 Claims Act. Plaintiff filed a Government Claims Form (“GCAF”) with the State Bar on or about
3 August 13, 2024, and received a formal rejection letter dated September 6, 2024. Plaintiff also
4 submitted prior written notices in December 2022 and June 2023. The State Bar’s response of
5 “no prior record” evidences a breakdown in record-keeping and does not negate constructive
6 notice. (See Exhibit 8.)

7
8 73. On August 18, 2023, The Committee of Bar Examiners directs PCL to conduct a
9 comprehensive transcript analysis and provide proof of compliance.

10
11 **VI.VII. OBSTRUCTION OF PLAINTIFF’S ACADEMIC PROGRESS**
12 **THROUGH RECORD MANIPULATION**

13 74. Plaintiff registered with the State Bar as a student, paid the requisite state administration
14 fees, and excelled in his studies, maintaining good academic standing throughout his
15 enrollment.

16 75. After passing the FYLSX, Plaintiff received copies of transcripts with many errors,
17 including incorrectly calculated class unit awards and missing required information. Plaintiff
18 promptly informed defendants of these errors and sought to rectify them to ensure
19 compliance with statute and State Bar regulations, but his efforts were consistently
20 obstructed by Defendants Gonzalez, Pena, Spiro, and Leonard. A true and accurate copy of
21 relevant transcripts and accompanying correspondence are attached as Exhibit 1.

22
23 76. Defendant Spiro, acting on behalf of PCL, knowingly engaged in misrepresentations
24 regarding Plaintiff’s tuition payments and credit arrangements. Specifically, on January 9,
25 2020, Defendant Spiro approved Plaintiff to work up to 40 hours at \$15 per hour from
26 January 4 to January 13, with a maximum gross pay of \$600. Defendant Spiro indicated that
27
28

1 Plaintiff could credit this amount against his tuition but required Plaintiff to provide written
2 approval for such an arrangement.

3 77. Despite Plaintiff's compliance, subsequent email exchanges revealed inconsistencies in
4 Defendant Spiro's accounting, ultimately resulting in Plaintiff being overcharged by
5 approximately \$2,400. Plaintiff's efforts to clarify these discrepancies were met with further
6 obstruction.

7
8 78. On July 8, 2022, despite Plaintiff's good academic standing, Spiro, on behalf of PCL,
9 emailed Plaintiff to inform him that PCL would not provide the required fourth-year courses
10 necessary for him to graduate. Todds originally expected graduation date of May 2023 is
11 now delayed until May 2025, a two-year delay. From 2019 until now, as of the filing of this
12 Fourth Amended Complaint, Plaintiff has never possessed an accurate transcript or law
13 degree, despite completing PCL's academic program.

14
15 79. On May 31, 2024, The California State Bar revokes PCL's charter due to protracted non-
16 compliance, effectively shutting down the school.

17
18 **VII.VIII. STATE BAR'S FAILURE TO ENFORCE COMPLIANCE**
DESPITE AWARENESS OF VIOLATIONS

19 80. As part of their gatekeeping function, State Bar Admissions staff, including Wilson,
20 Leonard, and Ching, were likely aware of PCL's record compliance issues before Plaintiff
21 matriculated because the State Bar requires student transcripts to be submitted to verify
22 eligibility prior to taking the FYLSX. Plaintiff made repeated attempts to rectify the errors
23 and engage the State Bar.

24
25 81. The State Bar was also on notice of the disparate outcomes at PCL and in the legal education
26 marketplace, as evidenced by the 2023 State Bar report entitled, "Profiling the Outcomes on
27 the FYLSX, a true and accurate copy obtained from the State Bar's website as Exhibit 3 and
28

1 the true and accurate copy of the formal grievance filed by Nancy Popp at Exhibit 2. Despite
2 this knowledge, the State Bar failed to take meaningful action to address these issues,
3 thereby emboldening and perpetuating PCL Defendant's pattern of disregard for educational
4 standards and student welfare that predates Plaintiff's enrollment in 2019.

5
6 82. The State Bar's 2023 report, 'Profiling the Outcomes of the FYLSX' (Exhibit 3), established
7 that prolonged education timelines significantly reduce the likelihood of bar passage,
8 particularly for African American males. Approximately nine in one hundred African
9 American males who complete their first year at schools like PCL pass the FYLSX,
10 resulting in a persistent ninety-one percent failure rate. PCL's deliberate obstruction of
11 Plaintiff's educational progress, including delayed graduation and inaccurate records, has
12 directly harmed his chances of passing the bar exam.

13
14 83. This ongoing non-compliance has resulted in PCL's greater than 90% attrition rate for
15 African Americans since at least 2017, with fewer than 1 in 10 entrants ultimately receiving
16 a degree even though PCL had a duty to vet candidates prior to matriculation.

17
18 **~~VIII~~.IX. FRAUDULENT REPRESENTATIONS AND MANIPULATION
OF STUDENT RECORDS**

19 84. Defendant Spiro, acting on behalf of PCL, knowingly engaged in misrepresentations
20 regarding Plaintiff's tuition payments and credit arrangements. Specifically, on January 9,
21 2020, Defendant Spiro approved Plaintiff to work up to 40 hours at \$15 per hour from
22 January 4 to January 13, with a maximum gross pay of \$600. Defendant Spiro indicated that
23 Plaintiff could credit this amount against his tuition but required Plaintiff to provide written
24 approval for such an arrangement. Despite Plaintiff's compliance, subsequent email
25 exchanges revealed inconsistencies in Defendant Spiro's accounting, ultimately resulting in
26
27
28

1 Plaintiff being overcharged by approximately \$2,400. Plaintiff's efforts to clarify these
2 discrepancies were met with further obstruction.

3 85. PCL's practices, including manipulation of academic records and denial of necessary
4 educational resources, disproportionately harmed African American students, including
5 Plaintiff. Statistical evidence demonstrates that African American students at PCL
6 experienced significantly lower graduation and bar passage rates, akin to the
7 unconstitutional segregation addressed in *Keyes v. School District No. 1*, 413 U.S. 189
8 (1973).
9

10

11 **IX.X. FAILURE TO DISCLOSE NON-COMPLIANCE AND MISLEADING**
12 **REPRESENTATION OF ACCREDITATION**

13 86. PCL failed to adhere to State Bar regulations by enrolling out-of-state students attending
14 remotely and failing to provide proper and timely disclosures as required under Rule 2.3(D).
15 PCL also maintained inaccurate records and misrepresented its compliance status, impeding
16 Plaintiff's ability to transfer or receive accurate transcripts, thereby obstructing his
17 educational progress. Despite its already limited capacity to provide adequate educational
18 resources to students, PCL expanded its class size without addressing pre-existing
19 deficiencies, which further exacerbated disparities in academic support and administrative
20 oversight. This expansion disproportionately impacted African American students, whose
21 graduation and bar passage rates were already lower due to PCL's non-compliance.
22 Furthermore, PCL's failure to comply with Rule 9.1, which mandates accurate record-
23 keeping and administrative procedures, directly harmed Plaintiff by preventing him from
24 timely transferring or pursuing further educational opportunities.
25

26 87. PCL did not disclose its non-compliance with State Bar regulations, including the improper
27 awarding of units, which prevented students from initial informed decision making or later
28

1 transfer to other law schools or timely qualifying for federal financial aid. (See Exhibit
2 201A, previously filed accompanying a request for judicial notice at ECF 102, p. 9-10)

3
4 **– FIRST CAUSE OF ACTION –**

5 **RICO CLAIM: DAMAGES UNDER THE VIOLATION OF THE**
6 **RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT**
7 **(18 U.S.C. §1962(c))**

8 **(Sarinana, Bouffard, Viramontes, Pena, Spiro, Gillens, Gonzalez, Torres, Aramayo, Sanchez,**
9 **Zuniga, Maestas, Franco)**

10 **88. Summary:**

11 Plaintiff brings this RICO cause of action under 18 U.S.C. § 1962(c), which prohibits any
12 person employed by or associated with an enterprise engaged in or affecting interstate
13 commerce from conducting or participating in the enterprise's affairs through a pattern of
14 racketeering activity. The statutory elements required for a valid RICO claim under § 1962(c)
15 are: i. The existence of an enterprise; ii. The enterprise engaged in or affected interstate
16 commerce; iii. The defendant's participation in the enterprise's affairs; iv. The defendant's
17 participation was through a pattern of racketeering activity; and v. The plaintiff suffered injury
18 to business or property by reason of the racketeering activity.

19 **89. Adherence to Rule 9(b) Standards:**

20 Plaintiff's Fourth Amended Complaint adheres to the heightened pleading standards
21 required for RICO claims involving allegations of fraud. Each predicate act, including wire and
22 mail fraud, systematic misrepresentation, obstruction of justice, and financial exploitation, is
23 detailed with specificity to identify the actors, dates, methods, and fraudulent statements made.
24 These allegations are described with particularity in Paragraphs 33-84, which collectively
25 establish a pattern of racketeering activity carried out through the enterprise.
26
27

28 **90. Predicate Acts Establishing Racketeering Activity:**

1 The pattern of racketeering activity is substantiated by specific fraudulent acts, including:

- 2
- 3 a. The dissemination of falsified transcripts through email and mail systems between 2019 and
- 4 2023 by Defendants Spiro, Pena, Sarinana, Bouffard, and others.
- 5 b. The misrepresentation of PCL's accreditation status and institutional compliance to students
- 6 and donors via email communications.
- 7 c. The obstruction of Plaintiff's ability to transfer through the manipulation of transcript
- 8 records.
- 9 d. Coercive billing practices employed to extract tuition payments under false pretenses. The
- 10 details of these predicate acts are provided in Paragraphs 33, 35, 37, 38, 41, and 42.
- 11

12 91. Pattern of Racketeering Activity:

13

14 Defendants engaged in a continuous pattern of racketeering activity involving multiple

15 predicate acts of mail fraud (18 U.S.C. § 1341) and wire fraud (18 U.S.C. § 1343) over a period

16 exceeding two years. These acts were committed with the common purpose of defrauding

17 students, obstructing justice, and suppressing evidence of institutional deficiencies. The conduct

18 was systematic, continuous, and directed at maintaining control over PCL's operations through

19 deceptive and coercive practices.

20

21 92. Incorporation of Allegations:

22

23 Plaintiff re-alleges and incorporates by reference each allegation contained in Paragraphs 33-84,

24 focusing on the facts that demonstrate the pattern of racketeering activity, including wire and

25 mail fraud (see ¶¶ 33, 35, 37, 38, 41, 42, 76, 84), systematic misrepresentation and fraudulent

26 schemes (¶¶ 33-40, 42-44, 46-57, 76, 84), institutional failure and facilitated fraud (¶¶ 35, 37,

27 39, 41, 43, 46, 47, 49-57, 76, 84), and the financial and emotional damages suffered by the

28

1 Plaintiff as a direct result (see ¶¶ 33-84, 76, 84). Because the fraudulent actions were carried out
2 through electronic communications and postal services, they are alleged to meet the definition
3 of predicate acts under RICO.
4

5 93. Enterprise Definition and Structure:

6 Plaintiff alleges that Defendants, including but not limited to The Peoples College of Law
7 (PCL) Board of Directors, Spiro, Pena, Bouffard, Gonzalez, Torres, Aramayo, Sanchez, Zuniga,
8 Maestas, Franco, Gillens, and Viramontes, operated as an associated-in-fact enterprise under 18
9 U.S.C. § 1961(4). The enterprise functioned with a hierarchical structure in which Defendants
10 exercised control over PCL's educational, administrative, and financial operations. The common
11 purpose of the enterprise was to maintain control over PCL through fraudulent practices,
12 including falsifying academic records, obstructing student progress, and retaliating against
13 individuals who exposed misconduct. This enterprise operated continuously from at least 2020
14 to the present.
15
16
17

18 94. Intentional Avoidance of Accountability:

19 Defendants engaged in a pattern of conduct aimed at avoiding accountability and frustrating
20 proper oversight. This conduct was facilitated by the State Bar's documented refusal to
21 intervene in student disputes and PCL's manipulation of enrollment practices to perpetuate
22 fraudulent billing and transcript management. Defendants knowingly utilized deceptive
23 practices to continue collecting tuition and avoid regulatory scrutiny.
24
25

26 95. Financial Exploitation Scheme:

27 PCL engaged in a scheme designed not only to defraud students through fraudulent
28 academic practices but also to misappropriate funds through financial exploitation. Despite

1 minimal operational costs, PCL collected substantial tuition payments and solicited donations
2 under false pretenses, funneling funds into an opaque structure devoid of proper oversight. This
3 arrangement strongly suggests that the scheme was also aimed at misappropriating funds rather
4 than providing the educational services promised to students. The fraudulent collection of funds
5 is detailed in ¶¶ 37, 40, 41, 48, 50, 52, 56, 65, and 66.

6
7
8 96. Targeting of Vulnerable Populations:

9 PCL knowingly recruited students from economically disadvantaged and underrepresented
10 backgrounds under the pretense of providing affordable, social-justice-oriented legal education.
11 Despite its obligations to provide adequate support, PCL expanded enrollment without
12 addressing record-keeping deficiencies, grade inflation, or administrative failures. The attrition
13 rate for African American students exceeded 90% since 2017, illustrating the predatory nature of
14 the scheme. These allegations are supported by the facts detailed in Paragraphs 37, 41, 42, and
15 85.
16

17
18 97. Institutional Non-Compliance:

19 PCL's pattern of non-compliance with State Bar regulations dates back to 2017, as
20 evidenced by the 2020 Inspection Report and subsequent probationary periods. Defendants'
21 failure to maintain accurate records, provide adequate disclosures, and comply with Rule 4.241
22 and California Business and Professions Code § 6061 reflects deliberate and prolonged
23 disregard for regulatory standards. Defendants' conduct is further detailed in Paragraphs 36, 40,
24 43, 46, 48, 56, 65, and 66.
25

26
27 98. Preferential and Discriminatory Treatment:
28

1 Defendants engaged in selective and prejudicial treatment of students. For example, Spiro
2 provided prompt corrections for Nancy Popp's transcripts but intentionally delayed or refused
3 corrections for Plaintiff's transcripts despite repeated requests. This discriminatory handling of
4 records obstructed Plaintiff's academic progress and resulted in financial and emotional harm.
5

6 99. Evidence Supporting Fraudulent Scheme:
7

8 Evidence of PCL's manipulation and misrepresentation of compliance is supported by: (a)
9 multiple versions of erroneous transcripts (Exhibit 1); (b) the State Bar's investigative reports
10 and press releases (Exhibits 201A and 201B); (c) student accounts or complaints, including
11 correspondence from Plaintiff and other students to PCL leadership (Exhibits 3 & 4); (d)
12 statements by Defendants, such as Spiro's June 8, 2022 email to the State Bar asserting
13 compliance (Exhibit 6); and (e) planning improper elections and likely unlawful ousting of PCL
14 members (Exhibit 7). The totality of this evidence supports Plaintiff's RICO claims by
15 establishing a pattern of fraudulent conduct and manipulation of academic records designed to
16 obstruct Plaintiff's educational progress and harm his professional prospects.
17
18

19 99A. . **Particularity of Fraud:** Plaintiff pleads fraud with particularity under Rule 9(b).

20 Specific misrepresentations include:

21 (a) issuance of intentionally inaccurate transcripts on August 3, 2021 by Spiro (Exhibit A);

22 (b) false representation of compliance by Spiro in his June 8, 2022 letter to the State Bar
23 (Exhibit 6);

24 (c) knowingly withheld documentation in support of Plaintiff's disability exemption (August–
25 September 2022);

26 (d) misrepresentations by Leonard in denying transcript accuracy and PCL compliance despite
27 internal knowledge (June 17, 2022, Exhibit A);
28

1 (e) wire fraud committed by Viramontes and Sanchez by disseminating misleading performance
2 and pass rate statistics (2021–2023, Exhibit C).

3 These acts occurred through U.S. mail and electronic communication, and each act is tied to
4 specific dates, individuals, and communications.

5
6 100. Violation of Unaccredited Law School Rules:

7 According to State Bar reports, Defendants continuously or repeatedly violated the 2008
8 through 2022 Guidelines for Unaccredited Law School Rules, including Rules 4.240, 4.241, and
9 4.242. These violations include failing to maintain accurate records, submit required reports, and
10 provide adequate disclosure statements to students. The deliberate manipulation of institutional
11 compliance protocols further underscores the Defendants' fraudulent intent.

12
13 101. Coordination of Fraudulent Scheme:

14 Defendants coordinated a scheme through Peoples College of Law ('PCL') to
15 intentionally manipulate academic records, knowingly misrepresent institutional
16 accreditation status, systematically delay degrees, and obstruct students' transfers.

17 Defendants' scheme involved multiple instances of mail and wire fraud to induce continued
18 enrollment and tuition payments from students, particularly exploiting African American
19 students, including Plaintiff. Plaintiff relied on these misrepresentations to his significant
20 financial and professional detriment.

21
22 102. Pattern of Racketeering Activity from 2019 to 2024:

23 From at least May 2019 to May 31, 2024, Defendants engaged in a continuous pattern of
24 racketeering activity that included: i. Wire and mail fraud by disseminating false information
25 about PCL's bar passage rates, compliance status, and instructional offerings; ii. Extortion by
26 threatening to deny services or withhold academic credentials unless additional payments were
27 made; iii. Unreasonable restraint of trade by awarding improper academic credits to discourage
28

1 transfer to other institutions; iv. Violations of State Bar Act §6001.1 by failing to recuse from
2 administrative decisions involving direct conflicts of interest; v. Breaches of fiduciary duty and
3 knowingly providing false assurances of compliance and withholding accurate academic
4 records; vi. Violations of civil or constitutional rights by discriminating against students based
5 on protected characteristics.

6
7 103. Defendants as RICO Persons:

8 At all relevant times, the Defendants were and are “persons” within the meaning of 18
9 U.S.C. § 1961(3) and § 1962(c)-(d). The enterprise comprised both natural persons and entities
10 operating collectively to further a fraudulent scheme.

11 104. Definition of Defendants:

12 The term “Defendants” refers to all named natural persons listed below the caption for this
13 First Cause of Action. Each Defendant acted individually and collectively to participate in the
14 racketeering enterprise described herein.

15
16 105. Participation in Racketeering Activity:

17 The natural persons named as Defendants are alleged to have participated in a pattern of
18 racketeering activity through direct acts of fraud, obstruction of justice, and systematic
19 misrepresentation, which collectively caused injury to Plaintiff’s business and property.

20
21 106. Facilitation of Fraudulent Conduct by the State Bar:

22 The State Bar’s documented refusal to enforce its own guidelines, coupled with PCL’s
23 inducement of instructors to provide unpaid services under false pretenses, facilitated a
24 continuous pattern of fraudulent conduct. PCL collected tuition from students under the guise of
25 providing a legitimate legal education while knowingly failing to meet statutory requirements.

26 107. Specific Predicate Acts:
27
28

1 Defendants Sarinana, Bouffard, Pena, Spiro, Gonzalez, Torres, Viramontes, and Sanchez
2 actively participated in or facilitated multiple predicate acts, including transmitting falsified
3 academic transcripts electronically on August 3, 2021, and making false representations
4 regarding PCL's compliance or accreditation status between 2021 and 2023. These actions were
5 carried out to maintain false accreditation status, thereby securing continuous tuition payments
6 and donations while avoiding regulatory scrutiny.
7

8 108. Establishment of RICO Enterprise:

9 From approximately 2019 through 2024, Defendants knowingly engaged in a pattern of
10 racketeering activity involving multiple acts of mail and wire fraud by misrepresenting
11 academic credit hours, institutional compliance, and instructional offerings. These fraudulent
12 activities were designed to maintain PCL's revenue stream and impede students' efforts to
13 transfer or obtain legitimate credentials.
14

15 109. Use of PCL as Instrument of Fraud:

16 Defendants operated the RICO Enterprise through PCL, utilizing its institutional
17 infrastructure and communications systems to facilitate predicate acts. The enterprise's
18 fraudulent activities affected interstate commerce by recruiting students nationwide and utilizing
19 interstate mail and wire systems to disseminate deceptive information.
20

21 110. Manipulation of Academic Records:

22 Defendants intentionally manipulated academic transcripts and misrepresented instructional
23 credit hours to maintain institutional accreditation and secure student enrollment. For example,
24 on August 3, 2021, Spiro instructed Plaintiff not to communicate with the California State Bar
25 about transcript discrepancies, thereby attempting concealment of fraudulent practices and
26 obstructing Plaintiff's efforts to seek redress.
27

28 111. Ongoing Non-Compliance with State Bar Regulations:

1 PCL's directors, officers, and agents, including Gonzalez, Pena, Spiro, Sarinana, and
2 Leonard, were aware of PCL's ongoing breaches of regulatory requirements, including
3 inaccurate record-keeping, improper credit calculations, and refusal to provide accurate
4 transcripts. Despite receiving formal grievances and complaints, such as the 2020 Inspection
5 Report and the grievance filed by Nancy Popp, PCL continued these practices. PCL's persistent
6 noncompliance, facilitated by inadequate enforcement from the State Bar, constitutes predicate
7 acts of mail and wire fraud because PCL continued to collect tuition under false pretenses of
8 regulatory compliance and offering legitimate educational services.

10 112. Distribution of Inaccurate Transcripts:

11 Defendants knowingly provided inaccurate transcripts to Plaintiff and similarly situated
12 students, obstructing their educational progress and professional advancement. These actions
13 were part of a continuous pattern of fraudulent conduct intended to conceal PCL's institutional
14 failures. (See Exhibits 1, 2 and 9).

16 113. Violation of Unaccredited Guideline 5.9:

17 PCL's deliberate and ongoing violation of Unaccredited Guideline 5.9 related to improper
18 credit calculation constitutes a fraudulent scheme involving the manipulation of academic
19 records to mislead students, including Plaintiff, about the legitimacy of their earned credits.
20 Dean Juan Manuel Sarinana and Registrar Zuñiga played direct and central roles in perpetuating
21 this fraudulent conduct. On April 28, 2022, Sarinana admitted in writing to the State Bar's
22 Office of Admissions that PCL continued to award semester unit credits for courses taught on a
23 quarter schedule, in direct violation of Unaccredited Guideline 5.9 (Exhibit C, ECF 199, p. ~~4~~
24 31-3; See also Docket 102, Exhibit 201A)

26 114. Admission of Non-Compliance:

1 Rather than implementing corrective measures, Sarinana attempted to justify PCL's non-
2 compliance by claiming that PCL historically awarded semester credits for quarter-based classes
3 despite the State Bar's explicit requirement that quarter units be calculated based on ten (10)
4 hours of classroom instruction per unit rather than fifteen (15). Sarinana acknowledged that this
5 non-compliant practice had been in place since at least the 2019-2020 academic year and
6 continued throughout Plaintiff's enrollment. (Id.)
7

8 115. Intentional Continuation of Fraudulent Practices:

9 Sarinana's admission, coupled with the State Bar's written directive to PCL regarding non-
10 compliance, establishes a knowing and willful continuation of fraudulent practices. Despite
11 notice from the State Bar, Sarinana and Zuñiga continued to disseminate inaccurate academic
12 records reflecting improper credit calculations. These falsified records were provided to
13 students, including Plaintiff, who relied on their accuracy for transfer, graduation, and eligibility
14 for the California Bar Examination. (Id.)
15

16 116. Pattern of Racketeering Through False Records:

17 PCL's ongoing non-compliance was reinforced by its pattern of submitting misleading
18 records and false representations to the State Bar. By knowingly distributing inaccurate
19 academic records via mail and electronic communication, Sarinana and Zuñiga engaged in a
20 pattern of racketeering activity involving repeated acts of wire and mail fraud. This conduct
21 demonstrates a deliberate scheme to misrepresent PCL's compliance with regulatory
22 requirements for the purpose of financial gain and to avoid accountability.
23

24 117. Racketeering Elements Met Under 18 U.S.C. §§ 1341 and 1343:

25 The ongoing fraudulent scheme, evidenced by Sarinana's admissions as Dean and Zuñiga's
26 dissemination of false transcripts as Registrar, satisfies the elements of wire and mail fraud
27 under 18 U.S.C. §§ 1341 and 1343. The scheme was intended to defraud Plaintiff and other
28

1 students of their legitimate educational credentials and opportunities. (See Exhibit C, ECF 102,
2 p. 1-2).

3 118. False Compliance Communications:

4 Defendants continued to perpetuate their fraudulent scheme through consistent email
5 communications falsely assuring compliance. On June 17, 2022, Natalie Leonard, a Program
6 Analyst for the State Bar of California's Office of Admissions, explicitly acknowledged to
7 Plaintiff that the provided transcripts were "disputed and incomplete," indicating ongoing
8 knowledge of fraudulent transcript representations.
9

10 119. Admission of Transcript Manipulation:

11 On November 9, 2022, Spiro, acting as attorney for PCL, engaged in email correspondence
12 with Natalie Leonard. In this exchange, Spiro acknowledged transcript inaccuracies and
13 admitted awareness of ongoing non-compliance with State Bar standards. Spiro indicated an
14 intent to amend certain transcripts but provided no assurance of comprehensive corrective
15 measures. (Exhibit C, ECF 199, pgs. 75 – 95, judicially noticed in ECF 248).
16

17 120. Admission of Non-Compliance:

18 In the same November 9, 2022, exchange, Spiro wrote to Leonard that Defendants
19 knowingly relied on Plaintiff to create his own coursework. This admission confirms the
20 Defendants' intentional failure to provide mandatory instructional hours due to the schemes
21 operational and financial motives. (Exhibit C, ECF 199, 75-95).
22

23 121. Use of Mail and Wire Systems:

24 Defendants used both electronic mail and U.S. mail systems to disseminate fraudulent
25 transcripts and false assurances of compliance. These communications caused Plaintiff and
26 similarly situated students to detrimentally rely on these misrepresentations in making
27 significant educational, financial, and career decisions.
28

122. Systematic Fraudulent Conduct:

The fraudulent conduct perpetrated by Defendants was systematic, continuous, and related. Persistent false communications through at least May 2024, when PCL's accreditation was revoked by the California State Bar, demonstrate a clear threat of ongoing illegal activities.

123. Proximate Cause of Injury:

As a direct and proximate result of Defendants' fraudulent actions and operation of the RICO Enterprise, Plaintiff has suffered substantial damages including, but not limited to, loss of educational opportunities, financial expenditures on tuition and related costs, severe emotional distress, and significant impairment of professional reputation and career progression.

124. Parallel to Discriminatory Practices:

The pattern of racketeering activity alleged here parallels discriminatory practices addressed in *Keyes v. School District No. 1, Denver, Colo.* The systematic targeting and exploitation of African American and minority students, including manipulation of academic records and obstruction of educational opportunities, constitutes a coordinated effort to exploit a vulnerable population for financial gain.

125. Repeated Use of Mail for Fraudulent Communications:

Between May 2019 and March 2024, Defendants Sarinana, Bouffard, Pena, Spiro, Gonzalez, and Torres repeatedly used U.S. Mail to distribute false academic transcripts and accreditation assurances to Plaintiff and similarly situated students. Specific communications dated June 17, 2022, and November 9, 2022, falsely represented PCL's compliance and induced continued enrollment and tuition payments.

126. Use of Wire Communications to Disseminate Fraudulent Statements:

Between May 2019 and March 2024, Defendants Spiro, Pena, Bouffard, Aramayo, Zuniga, Sarinana, Viramontes and Sanchez systematically used electronic mail to disseminate false

1 statements regarding PCL's bar passage rates, accreditation, accounts receivable and financial
2 solvency to students, prospective students, and donors. These misrepresentations directly
3 influenced enrollment and financial decisions based on knowingly false information. (See
4 Exhibits 8 and 9)

5
6 127. Impact on Interstate Commerce:

7 Defendants conducted their fraudulent activities through PCL, which substantially affects
8 interstate commerce by recruiting students nationwide, utilizing interstate mail and wire
9 systems, and receiving federal funding through State Bar-supported oversight activities.

10 128. Facilitation of Racketeering by PCL Agents and State Bar Employees:

11 Notably, evidence supports that individual PCL administrators and State Bar employees,
12 including the Defendants named herein, actively facilitated ongoing racketeering activities
13 through deliberate indifference and failure to enforce applicable guidelines. This deliberate
14 inaction enabled continuous fraudulent representations to be made to Plaintiff and other students
15 over multiple academic terms, resulting in significant economic harm and perpetuating systemic
16 racial inequalities within the legal education system. (See ECF 199, Exhibit C; also see Exhibits
17 1 and 9)

18
19 129. Discriminatory Impact and RICO Violation:

20 Defendants' fraudulent conduct disproportionately impacted African American students,
21 including Plaintiff, exacerbating systemic racial inequalities within legal education. This
22 disparate treatment constitutes a violation of federal law, specifically including the civil rights
23 protections embedded within RICO. Plaintiff was targeted through a combination of fraudulent
24 misrepresentation, obstruction of academic progress, and intentional manipulation of records
25 designed to deny him the benefits of his education. (See Exhibit 3.)

26
27 130. Evidence of Discriminatory Treatment:
28

1 The discriminatory nature of Defendants' conduct is further evidenced by their preferential
2 treatment of Nancy Popp. Unlike Plaintiff, whose transcripts were intentionally manipulated and
3 obstructed, Popp's transcripts were promptly corrected upon her request. This disparity strongly
4 supports Plaintiff's contention that Defendants engaged in discriminatory conduct based on
5 protected status or arbitrary and capricious decision-making. (See Exhibit 1)
6

7 131. Consequences of Discriminatory Conduct:

8 As a result of Defendants' fraudulent and discriminatory conduct, Plaintiff and other
9 similarly situated students were denied equal access to educational opportunities. Plaintiff
10 suffered tangible damages, including financial harm, emotional distress, and lost career
11 opportunities, all of which are directly attributable to Defendants' racketeering activities.
12

13 132. Structure of the RICO Enterprise:

14 The RICO Enterprise described herein was operated through a structured hierarchy
15 involving Defendants Sarinana, Bouffard, Pena, Spiro, Gonzalez, Torres, Viramontes, Aramayo,
16 Sanchez and the other Defendants. This enterprise functioned through PCL's institutional
17 infrastructure, with each Defendant assigned specific roles to advance the fraudulent scheme.
18 Specifically:

- 19 a. Spiro (Former Dean): Directed the manipulation of transcripts, provided misleading
20 accreditation assurances, and coordinated efforts to obstruct Plaintiff's attempts to
21 seek external remedies.
22
23 b. Pena (Vice President) & Sarinana (Former Dean): Facilitated the dissemination of
24 false academic records and obstructed Plaintiff's educational progress.
25
26 c. Gonzalez (President) & Torres: Misrepresented institutional accreditation status and
27 compliance to students and regulatory bodies.
28

- 1 d. Viramontes: Recruited faculty, coordinated school policy aimed at silencing student
2 grievances, and communicated fraudulent information through wire communications.
3 e. Sanchez: Disseminated fraudulent statements regarding election status and financial
4 solvency through wire communications.
5 f. Aramayo, Maestas, Gillens, Sarin and Bouffard: Participated in administrative
6 decisions, facilitated fraudulent communications, and engaged in improper debt
7 collection activities under threat of denying essential educational services.
8

9 133. Coordinated Scheme for Financial Gain:

10 Because each Defendant played a critical role in furthering the fraudulent enterprise's
11 objectives, their actions constituted a coordinated scheme designed to perpetuate fraud and
12 secure status or financial gain through unlawful means, including the manipulation of academic
13 records, dissemination of false accreditation information, and coercive billing practices.
14

15 134. Mail and Wire Fraud Legal Standards:

16 Mail and wire fraud require (1) a scheme to defraud, (2) use of mail or wire communication
17 in furtherance of the scheme, and (3) intent to deceive or cheat (*Schmuck v. United States*, 489
18 U.S. 705, 711 (1989)). Defendants' actions meet all elements necessary to establish violations
19 under these statutes. The RICO Enterprise's fraudulent activities were systematically carried out
20 through communications disseminated via electronic mail and postal services. This conduct
21 persisted over multiple years and involved numerous fraudulent transactions, demonstrating a
22 deliberate scheme to misrepresent PCL's compliance for financial gain.
23

24 135. Interstate Commerce Impact:

25 The RICO Enterprise's actions substantially affected interstate commerce by soliciting
26 tuition payments, donations, and enrollment from students and supporters residing in multiple
27 states. These transactions were processed through interstate banking systems, and fraudulent
28

1 representations were transmitted via email, phone calls, and postal services. The fraudulent
2 scheme extends beyond California, impacting individuals who relied on PCL's false
3 representations of accreditation and legitimacy.

4 136. Intent to Defraud:

5 The predicate acts of mail and wire fraud were executed with specific intent to defraud Plaintiff
6 and similarly situated students. Defendants relied on false representations to solicit tuition
7 payments, maintain institutional accreditation, and obstruct Plaintiff's ability to transfer or achieve
8 academic progress. The enterprise's fraudulent scheme directly caused Plaintiff's injuries.
9

10 137. Specific Predicate Acts:

11 The predicate acts of mail and wire fraud committed by the Defendants include, but are not
12 limited to:

- 13
- 14 a. August 3, 2021: Robert Ira Spiro sent an email instructing Plaintiff not to contact the
15 California State Bar regarding transcript discrepancies, intentionally concealing
16 fraud.
- 17 b. June 17, 2022: Natalie Leonard (State Bar Analyst) acknowledged to Plaintiff that
18 the transcripts provided were disputed and incomplete, evidencing PCL's fraudulent
19 misrepresentation.
- 20 c. November 9, 2022: Spiro admitted to Leonard that Plaintiff was required to create
21 his own coursework, confirming Defendant's failure to provide mandatory
22 instructional hours.
- 23 d. 2021-2023: Viramontes and Sanchez electronically transmitted misleading
24 curriculum information to faculty and students and potential donors as well as
25 facilitated communications related to course offerings that were non-compliant with
26 state law or State Bar guidelines.
27
28

- 1 e. Pena sent communications to the Secretary of State registering organizational
2 changes that resulted from unlawful ousting or noncompliant election with the
3 approval and participation of Gillens, Maestas, Franco and others.
4
5 f. Pena, Bouffard, Sarin, and Spiro ordered, oversaw, or sanctioned improper collection
6 of payments under threat of denying educational services.
7
8 g. Venegas, Aramayo and Zuniga coordinated the collection of fees and dissemination
9 of inaccurate student information to students and the State Bar.

10 137A. Particularity of Fraud: Plaintiff pleads fraud with particularity under Rule 9(b).

11 Specific misrepresentations include:

12 (a) issuance of intentionally inaccurate transcripts on August 3, 2021 by Spiro (Exhibit A);

13 (b) false representation of compliance by Spiro in his June 8, 2022 letter to the State Bar

14 (Exhibit 6);

15 (c) knowingly withheld documentation in support of Plaintiff's disability exemption (August–

16 September 2022);

17 (d) misrepresentations by Leonard in denying transcript accuracy and PCL compliance despite
18 internal knowledge (June 17, 2022, Exhibit A);

19 (e) wire fraud committed by Viramontes and Sanchez by disseminating misleading performance
20 and pass rate statistics (2021–2023, Exhibit C).

21 These acts occurred through U.S. mail and electronic communication, and each act is tied to
22 specific dates, individuals, and communications.

23
24 138. Fraud-Induced Reliance:

25 These fraudulent communications intentionally induced Plaintiff to continue enrollment and
26 make tuition payments under false pretenses, directly causing financial and professional harm.

27 The fraudulent communications and actions directly resulted in harm to Plaintiff by:
28

- 1 a. Inducing continued enrollment and payment of tuition based on false representations
- 2 of accreditation.
- 3 b. Obstructing Plaintiff's ability to transfer to another institution by falsifying
- 4 transcripts, resulting in lost educational opportunities and professional advancement.
- 5 c. Causing emotional distress through ongoing uncertainty about academic progress
- 6 and professional licensure.
- 7

8 139. Prevention of Educational and Professional Advancement:

9 Defendants knowingly provided falsified transcripts, withheld accurate academic records,
10 and made false representations about accreditation status. These actions directly prevented
11 Plaintiff from transferring to other institutions, completing his legal education, or qualifying for
12 licensure. Each instance of fraudulent communication, including but not limited to the emails
13 dated June 17, 2022, and November 9, 2022, contributed directly to Plaintiff's economic and
14 professional harm.

15
16 140. Breach of Duty of Care:

17 Defendants' failure to provide accurate transcripts and comply with institutional
18 accreditation standards also constitutes a breach of the duty of care owed to Plaintiff as a
19 student. The abrogation of PCL administrators and associated parties directly contributed to
20 Plaintiff's injuries because their acts of fraudulent misrepresentation were performed within the
21 scope of their institutional responsibilities and in reckless disregard of Plaintiff's educational
22 and professional rights.

23
24 141. Disparate Treatment and Racial Inequality:

25 The disparate treatment evidenced by Defendants' preferential treatment of Nancy Popp,
26 contrasted with their obstruction of Plaintiff's efforts to obtain accurate records, further
27 demonstrates the discriminatory nature of the enterprise's conduct. Because Defendants' fraudulent
28

1 scheme disproportionately impacted African American students, including Plaintiff, the racketeering
2 activity also perpetuated systemic racial inequalities within the legal education system. This pattern
3 of conduct violates federal RICO statutes and civil rights protections intended to ensure equal
4 access to educational opportunities.

5
6 142. Violation of Statutory and Constitutional Rights:

7 The actions of the Defendants, in their individual capacities, violated clearly established
8 statutory and constitutional rights. Their failure to enforce regulations, implement
9 discriminatory policies, and retaliate against Plaintiff for exercising his First Amendment rights,
10 are violations of well-established legal principles. A reasonable person in their position would
11 have known that their conduct was unlawful.

12
13 a. **Civil Rights Violation under 42 U.S.C. § 1983:** These defendants, as agents of PCL
14 were authorized agents of the State Bar and also acting in their individual capacities,
15 are alleged to have engaged in a conspiracy to deprive the plaintiff of his civil rights
16 under 42 U.S.C. § 1983. Specifically, they violated the plaintiff's constitutional
17 rights to a fair education and career progression by manipulating his transcript,
18 denying him transfer options, failing to process his exemption request, conspiring to
19 oust him as a duly elected corporate officer, and implementing the State Bar's non-
20 interference policy to effect and operate their alleged scheme. Many of these actions
21 were taken under the color of state law as the State Bar exercises regulatory control
22 over PCL, rendering the individual defendants liable for constitutional violations
23 including the denial of due process and equal protection under the Fourteenth
24 Amendment.

25
26 b. **Unruh Civil Rights Act Violation (Cal. Civ. Code § 51):** Defendants' conduct
27 discriminated against Plaintiff based on his protected status as an African-American
28

1 male student. Their actions deprived Plaintiff of equal access to educational
2 opportunities and career advancement, violating rights afforded to him under
3 California state law.

4 c. **Violation of California Education Code § 201:** This section guarantees that no
5 person shall be subjected to discrimination in any program or activity conducted by
6 an educational institution. By conspiring to manipulate Plaintiff's academic standing,
7 denying access to lawful exemptions, and interfering with his career progression,
8 Defendants engaged in unlawful conduct that directly violates the protections
9 afforded to Plaintiff under California law.

10 d. **Bane Act Violation (Cal. Civ. Code § 52.1):** Defendants' use of threats,
11 intimidation, or coercion to interfere with Plaintiff's rights to fair education, career
12 progression, and due process under both federal and state law constitutes a violation
13 of the Bane Act.

14 e. **Violation of California Education Code § 66270:** This statute prohibits
15 discrimination based on race, sex, disability, and other protected characteristics in
16 postsecondary educational institutions. The manipulation of Plaintiff's academic
17 standing and career opportunities constitutes discriminatory interference.

18 f. **Conspiracy Motivated by Racial Animus:** The alleged conspiracy to deprive
19 Plaintiff of his civil rights was motivated by racial animus, further compounding the
20 violation of Plaintiff's rights under federal and state law.

21 143. Ultra Vires Acts and Abuse of Authority:

22 Defendants, many of them licensees ostensibly acting under color of law, either knowingly
23 acted ultra vires or in excess of their authority or enforced unlawful rules that were certain to
24 produce unlawful outcomes, causing harm to Plaintiff. Defendants' actions were beyond the
25
26
27
28

1 scope of their lawful authority and were intended to harm Plaintiff's educational and
2 professional progress. (See Exhibits 2 and 7.)

3 144. Relevant Conduct Involving Plaintiff's Harm:

4 The relevant conduct involved:

- 5 a. The manipulation of Plaintiff's transcript. (See Exhibit 1)
- 6 b. The denial of viable transfer options. (See Exhibit 201A at ECF 102, p. 45)
- 7 c. The failure to process his exemption request in good faith. (*Id.* at 6-7)
- 8 d. Reliance on and exploitation of the "non-interference" policy. (*Id.* at 2)
- 9 e. Disseminating misleading information about PCL's compliance status. (*Id.* at 9-10)
- 10 f. Protracted failure to reasonably oversee and regulate PCL's operations. (*Id.* at 2)
- 11 g. Abusive and unreasonable fee collection and contractual renege.
- 12

13 145. Harm Caused by Non-Compliance:

14 Because of the Defendant's conduct and willful non-compliance, Plaintiff was prevented

15 from completing his legal education and obtaining his degree, causing him financial and

16 emotional harm. Defendants knew or should have known that the policies were unlawful

17 themselves or that their application would inevitably lead to unlawful consequences. PCL

18 agents, directors, officers and administrators had a duty to ensure that its policies and

19 regulations were lawful and did not infringe upon students' rights because PCL, as a regulated

20 entity, had a duty to comply with the state statutes and State Bar regulations and to operate in a

21 lawful and ethical manner. The individual defendants, as officers and employees of PCL, had a

22 duty to act in accordance with the law and to uphold their professional and ethical obligations.

23 (*Id.* at 9)

24 146. Proximate Cause and Equitable Tolling:

25

26

27

28

1 A RICO plaintiff must show that the predicate acts were the proximate cause of the injury
2 suffered (*Bridge v. Phoenix Bond & Indem. Co.*, 553 U.S. 639, 654 (2008)). Equitable tolling
3 applies where the defendant's fraudulent concealment prevented the plaintiff from discovering
4 the harm (*Rotella v. Wood*, 528 U.S. 549, 561 (2000)).
5

6 147. Justification for Equitable Tolling:

7 The concealment of accurate transcript information delayed Plaintiff's discovery of fraud,
8 warranting equitable tolling. The ongoing pattern of deceit, coupled with Defendants' intentional
9 misrepresentations, justifies equitable tolling of any applicable statutes of limitations as Plaintiff
10 reasonably relied on the Defendants' assurances of compliance. Plaintiff was unaware of the full
11 extent of the fraudulent scheme until it was uncovered through his persistent investigations.
12 Defendants' intentional misrepresentations and deliberate concealment of critical information
13 prevented Plaintiff from discovering the harm at an earlier date.
14

15 148. Direct Harm Caused by Defendants' Conduct:

16 The fraudulent communications and actions of the Defendants directly resulted in Plaintiff's
17 harm by:
18

19 a. Inducing Continued Enrollment and Financial Losses: Defendants knowingly
20 misrepresented accreditation and compliance to induce Plaintiff to continue his enrollment at
21 PCL. These fraudulent assurances caused Plaintiff to make substantial financial expenditures
22 on tuition and related costs under false pretenses.
23

24 b. Falsifying Transcripts and Obstructing Transfer: Defendants' manipulation of Plaintiff's
25 transcripts and refusal to provide accurate academic records obstructed Plaintiff's ability to
26 transfer to other institutions, complete his legal education, and pursue professional
27 advancement.
28

1 c. Emotional Distress and Professional Harm: The prolonged uncertainty and denial of
2 Plaintiff's educational progress, compounded by Defendants' deliberate obstruction and
3 defamation resulted in severe emotional distress and damage to Plaintiff's professional
4 reputation.

5
6 149. As a direct result of Defendants' racketeering activities, Plaintiff suffered specific
7 financial losses, including approximately \$55,000 in tuition, significant delay and
8 impairment of professional licensure and earning potential, and substantial emotional
9 distress directly caused by reliance upon Defendants' fraudulent misrepresentations.

10 150. WHEREFORE, Plaintiff respectfully requests this Court grant compensatory
11 damages, treble damages pursuant to 18 U.S.C. §1964(c), attorneys' fees, costs of suit,
12 injunctive relief against ongoing and future fraudulent acts, and such other relief as is
13 outlined in the 'Remedies and Relief' section of this pleading.
14

15
16
17
18 **– SECOND CAUSE OF ACTION –**
19 **CLAIM FOR VIOLATION OF THE UNRUH CIVIL RIGHTS ACT**
20 **(CALIFORNIA CIVIL CODE § 51)**
(The Peoples College of Law)

21 151. **Summary:** This cause of action arises from Defendants' violation of the Unruh Civil
22 Rights Act, California Civil Code § 51, through discriminatory practices that denied Plaintiff
23 equal access to educational opportunities, benefits, and services provided by PCL.
24 Defendants, including PCL and its agents, engaged in intentional practices that resulted in
25 unequal treatment of Plaintiff based on his race. These discriminatory acts were carried out
26 by Defendants Gonzalez, Pena, Spiro, Sarinana, Sarin, and other agents of PCL through acts
27 of deliberate neglect, manipulation of academic records, and refusal to provide
28

1 accommodations extended to other students including selective transcript corrections,
2 refusal to provide essential courses, imposing arbitrary requirements, class interference,
3 retaliation and deliberately neglecting Plaintiff's educational progress. This conduct, enabled
4 by the State Bar's failure to enforce regulations, resulted in substantial harm to Plaintiff's
5 education and career prospects.
6

7 152. **Incorporation of Allegations:** Plaintiff re-alleges and incorporates by reference
8 each allegation contained in ¶¶ 1-121, with particular emphasis on the allegations
9 concerning the denial of full and equal accommodations and the discriminatory treatment
10 based on race (see ¶¶ 22-30, 56-58, and 83-90, 120-121, 144-145 and 149).
11

12 153. **Business Establishment:** PCL, as a private law school offering legal training in
13 exchange for tuition, qualifies as a 'business establishment' within the meaning of California
14 Civil Code § 51. As such, it is required to provide full and equal accommodations to all
15 students regardless of race or other protected characteristics.
16

17 154. **Discriminatory Conduct by PCL and Its Agents:** Defendants Gonzalez, Pena,
18 Spiro, Sarinana, and Maestas, as agents of PCL, engaged in conduct that intentionally or
19 effectively denied Plaintiff equal access to educational opportunities and services on the
20 basis of race.
21

22 155. PCL's deliberate refusal to provide accurate transcripts, denial of necessary
23 coursework, and manipulation of academic records disproportionately harmed Plaintiff and
24 other minority students. The State Bar's failure to intervene despite repeated complaints
25 enabled PCL to continue these discriminatory practices without correction or accountability.
26

27 156. **Discriminatory Intent and Impact:** Defendants' conduct was substantially
28 motivated by Plaintiff's race. PCL's discriminatory policies and practices, including refusal
to correct transcripts, denial of course access, and imposing unequal requirements,

1 disproportionately harmed Plaintiff by obstructing his academic progress and preventing him
2 from completing his legal education. PCL's discriminatory practices are evidenced by its
3 preferential treatment of other students, such as Nancy Popp, whose transcripts were
4 corrected promptly upon request, whereas Plaintiff's requests for corrections were
5 repeatedly denied or obstructed.
6

7 157. **Violation of the Unruh Act:** PCL's discriminatory practices constitute a violation of
8 the Unruh Civil Rights Act because they deny Plaintiff full and equal accommodations,
9 advantages, facilities, privileges, or services as required under California Civil Code § 51.

10 158. PCL's failure to address issues raised by students, including the grievances
11 documented in the 2020 Inspection Report and Nancy Popp's complaint, demonstrates
12 inconsistent and selective responses to student concerns. PCL promptly addressed the
13 complaints raised by Nancy Popp, a white female, as evidenced by documented corrections
14 to her transcripts. In contrast, PCL failed to adequately respond to Plaintiff's grievances
15 concerning inaccurate records and course access. This disparate treatment, which
16 disproportionately harmed Plaintiff as a minority student, suggests a pattern of arbitrary or
17 discriminatory practices in violation of the Unruh Civil Rights Act.
18

19 159. **Specific Acts of Discrimination:** Plaintiff alleges that the actions and inactions of
20 PCL, through its officers, directors, employees, and agents, acting under color of state law
21 due to PCL's extensive regulation by and relationship with the State Bar, and the State Bar,
22 through its employees acting outside their official capacities, have caused him harm due to
23 the lack of an accurate transcript and the planned and intentional denial of a degree.
24

25 160. PCL's ongoing violation of Unaccredited Guideline 5.9 concerning improper credit
26 calculation constitutes discriminatory conduct that denied Plaintiff full and equal
27 accommodations, privileges, and advantages as required under California Civil Code § 51.
28

1 Despite receiving multiple notifications from students, including Plaintiff, regarding
2 discrepancies between quarter-based instruction and semester-based credit awards,
3 Defendants Sarinana, Pena, Zuñiga, Aramayo and Spiro acting as agents of PCL, knowingly
4 continued to issue transcripts reflecting incorrect credit calculations. (See ECf 199, Exhibit
5 C, p. 72-74).

6
7 The discriminatory acts by PCL include:

- 8 a. Selectively refusing to correct Plaintiff's transcripts while providing corrections for
9 similarly situated students, such as Nancy Popp.
- 10 b. Denying Plaintiff access to necessary courses required for graduation, despite
11 offering these courses to other students.
- 12 c. Imposing heightened and arbitrary requirements on Plaintiff, creating barriers not
13 applied to others.
- 14 d. Failing to maintain and enforce policies ensuring equal treatment and transparency in
15 educational services.

16
17 161. **Harm to Plaintiff:** As a result of these discriminatory practices, Plaintiff suffered
18 tangible harm including:

- 19 a. Financial loss due to delayed graduation and additional educational expenses.
- 20 b. Emotional distress resulting from denial of academic opportunities.
- 21 c. Loss of educational opportunities and professional impairment, directly affecting
22 Plaintiff's ability to pursue a legal career.

23
24 The acts or omissions used to obtain this result include:

- 25 i. Gonzalez, Pena, Spiro, Sarinana, Bouffard, Sarin, Franco and Maestas denied,
26 conspired to deny, or conspired to aid or incite a denial of the full and equal
27

1 advantages, facilities, privileges, or services in the educational opportunities offered
2 by PCL.

3 ii. **Enabling Discriminatory Practices:** The State Bar’s consistent failure to enforce
4 regulatory standards and reliance on a ‘non-interference’ policy enabled PCL’s
5 agents to deny Plaintiff critical educational resources, shielded discriminatory
6 practices from scrutiny, and fostered a permissive environment that
7 disproportionately harmed Plaintiff. The State Bar’s failure to enforce its regulations,
8 combined with its non-interference policy, emboldened PCL to continue engaging in
9 discriminatory conduct without fear of accountability. By refusing to intervene or
10 enforce oversight despite clear knowledge of PCL’s ongoing violations, the State Bar
11 created an environment where PCL felt empowered in its discriminatory practices
12 against Plaintiff with impunity. (See Exhibit 201A, previously filed accompanying a
13 request for judicial notice at ECF 102, p. 2)
14

15
16 iii. PCL’s exploitation and informed reliance on the State Bar’s “non-interference”
17 policy that gave notice to the actors of student non-recourse and that inevitably and
18 disproportionately affected students from unaccredited schools. (*Id.*)

19 iv. PCL’s misleading advertising and recruitment practices that targeted vulnerable
20 communities, as facilitated by Gonzalez, Pena, Spiro, and Sarinana. (*Id.* at 42)

21
22 v. PCL’s failure to provide a quality education and accurate transcripts, because of the
23 actions and inactions of Gonzalez, Pena, Spiro, Sarin, Bouffard and Sarinana. (*Id.* at
24 9-10)

25 162. PCL’s discriminatory practices, including in allowing certain records to be corrected
26 with the remainder uncorrected, despite its duty of accurate record keeping, regulatory
27 authority and knowledge of the issues, constitutes a violation of the Unruh Civil Rights Act.
28

1 163. PCL, through its officials and employees, targeted vulnerable classes, induced
2 matriculation and operated under conditions likely to result in student failure, without
3 adequate oversight or intervention.

4 164. Defendants' conduct, including the deliberate issuance of inaccurate transcripts,
5 refusal to provide necessary corrections, and the imposition of arbitrary requirements,
6 disproportionately impacted Plaintiff due to his race and status as a student from an
7 unaccredited school. PCL's failure to provide accurate transcripts and equal access to
8 educational resources directly impaired Plaintiff's ability to transfer, graduate, and pursue
9 licensure, constituting a violation of the Unruh Civil Rights Act.
10

11 165. As a result of these discriminatory practices, Plaintiff suffered financial harm,
12 emotional distress, and a loss of educational and professional opportunities.
13

14 166. **Prayer for Relief:** Plaintiff seeks:

- 15 a. Compensatory damages according to proof.
16 b. Punitive damages to the extent allowed by law.
17 c. Injunctive relief to prevent future discriminatory practices.
18 d. Attorneys' fees and costs as permitted under California law.

19 **– THIRD CAUSE OF ACTION –**

20 **CLAIM FOR NEGLIGENCE AND NEGLIGENCE PER SE**

21 (The Peoples College of Law and Its Board of Directors, Gonzales, Spiro, Pena, Franco,
22 DeuPree, Silberger, Gillens, Viramontes)

23 167. **Summary:** This cause of action arises from the Defendants' negligent actions,
24 including their failure to provide accurate transcripts, refusal to award degrees despite
25 completion of program requirements, and lack of proper oversight of PCL's compliance with
26 educational standards. Specifically, the Defendants, including PCL and its officers, breached
27 their duty by:

- 28 a. Failing to maintain accurate records of Plaintiff's academic progress, as evidenced
by the erroneous transcripts issued from 2020 to the present day.

1 b. Refusing to recognize Plaintiff's completion of required coursework, despite clear
2 documentation of his academic efforts.

3 c. Implementing policies that obstructed Plaintiff's educational progress and retaliating
4 against him for protected activities, including his whistleblowing efforts and
5 advocacy for institutional transparency.
6

7 These negligent actions were disproportionately harmful to Plaintiff, constituting
8 negligence per se under applicable regulations, including Rules 2.3(D), 4.241, and
9 9.1. As a result, Plaintiff suffered significant economic and non-economic damages.
10

11 168. Plaintiff re-alleges and incorporates by reference each allegation contained in ¶¶ 33-
12 84, 88, 91, 102-120, 186-206, and 213-216 of the Fourth Amended Complaint.
13

14 169. A showing of negligence requires Plaintiff to demonstrate duty, breach of duty,
15 causation and damages.

16 170. Duty to Comply with Law:

17 Defendants knew or should have known that their policies and actions were unlawful or that
18 their application would inevitably result in unlawful consequences. PCL agents, directors, officers,
19 and administrators had a duty to ensure compliance with state statutes and State Bar regulations. As
20 a regulated entity, PCL was obligated to operate lawfully and ethically. The individual defendants,
21 as officers and employees of PCL, were responsible for upholding their professional and ethical
22 obligations. (Id. at 9)
23

24 171. The negligent actions of PCL and the State Bar, including the failure to provide
25 accurate transcripts, the delay in awarding degrees, and the lack of proper oversight, have
26 disproportionately impacted African American students and have specifically harmed the
27 Plaintiff.
28

1 172. In a November 9, 2022, email from Spiro, acting as counsel for PCL, to Natalie
2 Leonard, Spiro acknowledged PCL's failure to monitor Plaintiff's academic progress,
3 despite being aware of the necessity for oversight. Spiro admitted:

4 "PCL should have monitored the student's progress in creating the courses. We at PCL
5 acknowledge we should have done better. We should have checked with the student
6 periodically to verify how he was progressing in creating the courses. I believe we did not. I
7 doubt PCL will again make an agreement with a student for the student to take courses out
8 of order and create courses to resolve problems caused by taking them out of order. But if
9 PCL ever does that again, PCL surely will establish a timetable for verifying with the student
the progress in creating the courses." (See ECF199, pages 75 - 95. The Court has ruled that
these records are judicially noticed to the extent they bear on Plaintiff's ability to amend his
complaint at ECF 248).

10 173. Despite Spiro's apparent admission of negligence, this statement was, in fact, a
11 deliberate falsehood intended to obscure PCL's retaliatory conduct. Contrary to Spiro's
12 claim, he never permitted Plaintiff to create coursework or devise an alternative academic
13 plan. Instead, Spiro categorically refused to offer the required coursework or approve any
14 proposed alternatives advanced by Plaintiff. This refusal was a direct act of retaliation
15 against Plaintiff for his prior whistleblowing and advocacy for transparency at PCL. Spiro's
16 communication was a calculated effort to mislead regulators, shifting the blame onto
17 Plaintiff while concealing PCL's systemic failures and retaliatory practices.

18
19 174. Spiro's November 9, 2022, email was not a genuine acknowledgment of negligence
20 but a strategic misrepresentation intended to shield PCL from regulatory scrutiny. By falsely
21 implying that Plaintiff had the autonomy to create his own courses and that PCL's failure
22 was merely one of oversight, Spiro sought to obscure the reality: PCL's categorical refusal to
23 provide necessary coursework or accept Plaintiff's reasonable alternatives was a deliberate
24 effort to obstruct Plaintiff's progress in retaliation for his protected activities.

25
26 175. Notwithstanding Spiro's misrepresentation, PCL's failure to establish and implement
27 a coherent process for oversight, combined with its admission that such oversight was
28

1 required, demonstrates both negligence and recklessness. The failure to provide adequate
2 guidance and establish reasonable accommodations for Plaintiff's academic progress
3 constituted a breach of PCL's duty of care. As a direct result of PCL's breach, Plaintiff
4 experienced significant harm, including educational setbacks, emotional distress, financial
5 losses, and professional impairment.
6

7 176. The Defendants' acknowledgment of their failure to monitor Plaintiff's progress, as
8 documented in Spiro's November 9, 2022 email, coupled with Spiro's explicit refusal to
9 accept Plaintiff's proposed academic alternatives, constitutes a breach of duty. Despite being
10 aware of the necessity for oversight, Spiro and other PCL officials actively obstructed
11 Plaintiff's attempts to continue his education by refusing reasonable accommodations. This
12 refusal occurred after Plaintiff had made multiple documented attempts to address transcript
13 discrepancies and propose compliant coursework solutions, all of which were denied
14 without reasonable justification.
15

16 177. The Defendants' actions were not only negligent but intentionally retaliatory, as
17 evidenced by Spiro's refusal to accept alternative coursework plans following Plaintiff's
18 protected activities, including whistleblowing and advocacy for institutional transparency.
19 By refusing to engage in a reasonable accommodation process and obstructing Plaintiff's
20 efforts to complete his education, the Defendants' conduct proximately caused Plaintiff's
21 harm, including lost educational opportunities, financial damages, and emotional distress.
22

23 178. Defendants, as officers and directors of PCL, had a duty to ensure the accuracy of
24 student transcripts, timely offering of compliant legal education, and adherence to the
25 educational contract and implied covenants of good faith and fair dealing. Their failure to do
26 so constitutes a breach of this duty.
27
28

1 179. These defendants had a regulatory duty to oversee PCL's compliance with
2 educational standards. Their failure to intervene or address known issues at PCL constitutes
3 negligence per se, as it violated statutes and regulations designed to protect students like the
4 Plaintiff.
5

6 180. **Duty of Care:** A duty of care exists where a party has an obligation to act with
7 reasonable care to avoid causing harm to another. In the context of educational institutions,
8 this duty includes maintaining accurate records, providing truthful information about
9 educational programs, and adhering to statutory and regulatory requirements governing legal
10 education. Negligence per se applies when a party violates a statute or regulation intended to
11 protect a particular class of persons, resulting in harm to a member of that class.
12

13 181. The Defendants breached their duty of care in the following ways:

- 14 a. Failure to Provide Accurate and Timely Transcripts: Despite repeated requests from
15 Plaintiff, PCL failed to provide accurate transcripts that reflected completed
16 coursework, as evidenced by the erroneous transcripts provided from 2020 through
17 2023. This failure was compounded by Spiro's admission in the November 9, 2022
18 email, acknowledging PCL's deficient monitoring processes.
- 19 b. Failure to Award Degrees Despite Completion of Program Requirements: Plaintiff
20 completed all required coursework; however, PCL's refusal to recognize this
21 completion and issue a degree was an arbitrary denial intended to obstruct Plaintiff's
22 progress. Spiro's November 9, 2022 email further illustrates PCL's failure to adhere
23 to established protocols for verifying academic progress.
- 24 c. Failure to Maintain Accurate Records: PCL failed to comply with Rule 9.1 by
25 neglecting to maintain accurate and complete academic records. Erroneous
26 transcripts, inconsistent credit allocations, and the absence of coherent
27
28

1 documentation standards are evidenced by multiple versions of Plaintiff's transcripts
2 provided by PCL.

- 3 d. Failure to Adhere to Student Solicitation and Matriculation Standards: PCL violated
4 Rule 2.3(D) by failing to make proper and timely disclosures to Plaintiff upon
5 enrollment and throughout his academic tenure. This includes failing to disclose the
6 improper awarding of units, which prevented Plaintiff from making informed
7 decisions about his educational path.
- 8 e. Failure to Oversee Compliance with Regulations: Despite PCL's known deficiencies,
9 including those documented in the 2020 Inspection Report and subsequent
10 probationary period, the Defendants failed to implement corrective measures or
11 maintain compliance with State Bar regulations.
- 12 f. Allowing Discriminatory Practices: The disparate treatment of Plaintiff compared to
13 other students, such as Nancy Popp whose transcript issues were corrected promptly
14 and accurately, demonstrates a pattern of discriminatory practices intended to
15 retaliate against Plaintiff for his advocacy and whistleblowing.
- 16 g. Retaliation Against Plaintiff for Exercising His First Amendment Rights: Defendants
17 actively obstructed Plaintiff's attempts to address transcript discrepancies and
18 propose reasonable alternatives. Spiro's November 9, 2022 email mischaracterized
19 Plaintiff's efforts and falsely suggested PCL permitted Plaintiff to devise his own
20 coursework plan. In reality, PCL refused Plaintiff's reasonable proposals and
21 engaged in retaliatory conduct intended to chill Plaintiff's advocacy.
- 22
23
24

25 182. The Defendants' breaches of duty, including their failure to adhere to statutory
26 standards, constitute negligence per se. Plaintiff suffered harm directly resulting from the
27 Defendants' actions, including financial loss, emotional distress, and educational setbacks.
28

1 183. PCL, through its agents Sarinana and Zuñiga, breached its duty of care to Plaintiff by
2 knowingly issuing inaccurate transcripts that failed to comply with the credit calculation
3 requirements set forth under Unaccredited Guideline 5.9. Despite receiving multiple notices
4 from students, including Plaintiff, and explicit directives from the State Bar highlighting
5 PCL's non-compliance, Sarinana and Zuñiga continued to disseminate academic records
6 reflecting improper credit awards. (See Exhibit C, previously filed accompanying a request
7 for judicial notice at ECF 102, p. 1-3).
8

9 184. As acknowledged by Sarinana in his April 28, 2022 correspondence with the State
10 Bar's Office of Admissions, PCL had improperly awarded semester unit credits for courses
11 taught under a quarter system since the 2019-2020 Academic Year. Rather than correcting
12 this discrepancy or ensuring compliance with Guideline 5.9, Sarinana and Zuñiga
13 perpetuated the issuance of inaccurate transcripts that directly harmed Plaintiff by
14 preventing him from timely transferring, graduating, or pursuing further educational
15 opportunities. (Id.)
16

17 185. PCL's negligence, facilitated by the actions of Sarinana and Zuñiga, resulted in
18 tangible harm to Plaintiff's educational progress and career prospects. PCL's failure to
19 adhere to recognized standards of care and its deliberate disregard for regulatory
20 requirements constituted a breach of duty that caused Plaintiff financial losses, emotional
21 distress, and diminished professional opportunities.
22

23 186. Negligence per se applies where a party violates a statute or regulation intended to
24 protect a specific class of persons, resulting in harm to a member of that class. Relevant
25 standards include Rules 2.3(D), 4.241, and 9.1, which establish requirements for accurate
26 record-keeping, appropriate disclosures, and adherence to established educational standards.
27 Here, Defendants' violations include:
28

- a. Failing to maintain accurate records as required by Rule 9.1.
- b. Failing to disclose accurate unit awards and other essential academic information as required by Rule 2.3(D).
- c. Failing to provide timely and compliant educational services as required by Rule 4.241.

187. Defendants failed to comply with the 2022 Guidelines for Unaccredited Law School Rules, specifically Rules 4.240, 4.241, and 4.242, by failing to maintain accurate records, submit required reports, and provide adequate disclosure statements to students.

188. **Negligence per se:** By failing to comply with these standards, the Defendants acted negligently per se. These violations were intended to protect students like Plaintiff from harm, and the resulting inaccuracies and refusals to provide required services caused Plaintiff tangible harm.

189. The Defendants' actions, individually and collectively, constitute negligence per se as they violated statutory and regulatory standards governing educational institutions, including Rules 2.3(D), 4.241, and 9.1, as well as Plaintiff's First Amendment rights.

190. The Defendants' violations of applicable regulations constitute negligence per se, and Plaintiff has demonstrated a direct causal connection between the Defendants' conduct and his injuries.

191. Gonzales, Spiro, Pena, Franco, DeuPree, Silberger, Gillens, breached a duty by allowing their employees and agents to act in opposition to or outside the scope of their employment to the detriment of the Plaintiff, the Defendants, as agents of PCL or employees or appointees of the State Bar, breached their duty to hire and utilize only individuals who would comply with the law and to properly train and supervise those individuals to ensure compliance.

1 192. PCL allowed Spiro, Pena, Gonzalez, Sarin, Bouffard, Maestas, Torres to discriminate
2 against Todd so that PCL could continue operating in noncompliance.

3 193. PCL failed to accommodate or supply services, even after Todd multiple requests for
4 the provision of “teach-out” or other classes to accommodate the State Bar’s communicated
5 requirements and PCL’s commitments.

6
7 193A. In addition to passive awareness, certain State Bar employees, acting within the scope of
8 their official duties, affirmatively chose to withhold enforcement actions, downplayed transcript
9 irregularities in correspondence with PCL, and delayed investigation of Plaintiff’s CPRA and
10 grievance submissions. These omissions occurred in the face of specific, documented violations
11 and materially contributed to Plaintiff’s harm. Plaintiff alleges that such conduct constitutes
12 more than regulatory inaction; it reflects coordinated administrative indifference in violation of
13 statutory oversight obligations. Plaintiff asserts that Defendants were emboldened by the
14 conduct and circumstances.
15

16 194. Spiro appears to dismiss Plaintiff’s concerns and downplays the severity of the issues
17 at PCL, which could be seen as further evidence of negligence in addressing the situation.
18 (See Exhibit 6)

19 195. As a proximate result of PCL’s breach of duty, Plaintiff was injured, in amounts to be
20 proven at trial.

21
22 196. This conduct is alleged to constitute inclusively negligence, under the common law,
23 statutory or negligence per se doctrines as it violated statutes, regulations, and rules designed
24 to protect individuals like the plaintiff and because the consequences are likely to have
25 resulted from the negligence or fault of the Defendants.
26
27
28

1 197. **Res Ipsa Loquitur:** Alternatively, the doctrine of Res Ipsa Loquitur applies to this
2 cause of action, as the harm Plaintiff suffered is of the type that ordinarily does not occur in
3 the absence of negligence. Specifically:

- 4 a. **Issuance of Multiple Erroneous Transcripts:** Over a period of years, Defendants
5 provided conflicting versions of Plaintiff's academic records, spanning from 2020
6 through 2023. This repeated issuance of erroneous transcripts suggests a systematic
7 failure in PCL's record-keeping and administrative processes that would not occur if
8 appropriate oversight mechanisms were in place.
9
10 b. **Failure to Recognize Completion of Required Coursework:** Despite clear evidence of
11 Plaintiff's completion of required coursework, PCL refused to award a degree. Such
12 conduct is extraordinary and demonstrates a failure to adhere to standard academic
13 practices and regulatory compliance.
14
15 c. **Non-Compliance with Regulatory Requirements:** Defendants' failure to comply
16 with established regulations under Rules 2.3(D), 4.241, and 9.1, despite having
17 exclusive control over administrative processes, record-keeping systems, and
18 compliance mechanisms, indicates negligence.
19
20 d. **State Bar's Failure to Enforce Compliance:** The State Bar's failure to enforce
21 compliance, despite documented reports of non-compliance and procedural
22 deficiencies, further underscores a lack of appropriate oversight that does not absolve
23 the Defendant's of their own duties or requisite oversight requirements, further
24 demonstrating negligence.

25 198. **Exclusive Control:** The instrumentalities causing the harm, namely the school's
26 administrative processes, educational services, record-keeping systems, and compliance
27 mechanisms, were all under the exclusive control of PCL's officers, directors, employees,
28

1 and agents. Plaintiff, as a student, had no control over these processes and relied upon the
2 Defendants to fulfill their duties in good faith.

3 199. **No Contributory Negligence:** Plaintiff took reasonable steps to address transcript
4 discrepancies, propose compliant coursework solutions, and engage in dialogue with PCL
5 administrators and the State Bar. His efforts to resolve these issues were met with
6 obstruction, retaliation, and deception rather than appropriate corrective measures.
7 Therefore, the harm Plaintiff suffered was not the result of any failure on his part.
8

9 200. **Type of Harm Ordinarily Not Occurring Absent Negligence:** The harm suffered
10 by Plaintiff, including the denial of accurate transcripts, failure to receive a degree despite
11 completion of coursework, financial loss, and emotional distress, are not harms that
12 ordinarily occur in the absence of negligence. Properly maintained records, appropriate
13 administrative oversight, and compliance with established standards are essential functions
14 of any educational institution and regulatory body.
15

16 201. **Causal Connection to Defendants' Negligence:** Thus, applying the doctrine of Res
17 Ipsa Loquitur, the Defendants' negligence can be inferred from the circumstances
18 surrounding their failure to maintain accurate records, comply with regulatory requirements,
19 and provide adequate oversight. This inference is further supported by the Defendants' own
20 admissions of oversight failures, including Spiro's November 9, 2022, email, which
21 acknowledges PCL's failure to monitor Plaintiff's academic progress and the subsequent
22 probation and withdrawal of its charter to operate as a law school effective May 2024. Under
23 the doctrine of Res Ipsa Loquitur, the burden of proof shifts to the Defendants to provide
24 evidence that the harm was not caused by their negligence. As established in *Byrne v.*
25 *Boadle*, 2 H. & C. 722, 159 Eng. Rep. 299 (Ex. Ch. 1863) (holding that barrels do not fall
26 from warehouses without negligence) and *Ybarra v. Spangard*, 25 Cal. 2d 486, 154 P.2d 687
27
28

1 (Cal. 1944) (holding that the Res Ipsa Loquitur doctrine applies even when multiple parties
2 have control over the instrumentality causing harm), when the evidence strongly suggests
3 negligence under the exclusive control of Defendants, it is their responsibility to rebut this
4 presumption. Their continued failure to do so further supports Plaintiff's claims of
5 negligence.
6

7 202. The harm suffered by Todd— the denial of an accurate transcript and degree, the
8 financial loss, PCL's loss of charter and the emotional distress resulting therefrom – is not
9 the type of harm that ordinarily occurs in the absence of negligence. The instrumentalities of
10 harm, namely the school's administration, educational services, record-keeping systems, and
11 the State Bar's regulatory oversight, were under the exclusive control of the Defendants. The
12 Plaintiff, as a student, had no control over these instrumentalities and relied on the
13 Defendants to fulfill their duties. Therefore, it is reasonable to infer that the harm suffered
14 by Plaintiff was more likely than not caused by Defendants' negligence.
15

16 203. Defendants, as officers, directors, employees, and agents of PCL, owed a duty of
17 care to Plaintiff to act reasonably and prudently in their roles as administrators and educators
18 at the law school. Defendants breached their duty of care by failing to provide accurate and
19 timely transcripts, failing to award a degree despite Plaintiff's completion of the program
20 requirements, failing to maintain accurate records and provide timely access to them, failing
21 to adhere to student solicitation, recruitment, and matriculation standards, and failing to
22 oversee PCL's compliance with regulations. This conduct constitutes negligence per se as it
23 violated statutes, regulations, and rules designed to protect individuals like Plaintiff from the
24 harm suffered. As a direct and proximate result of their negligence and negligence per se,
25 Plaintiff suffered damages.
26
27
28

1 204. PCL, and its employees, officers, agents, and appointees, owed a duty of care to
2 Plaintiff to act reasonably and prudently in their roles as offerors and regulators of legal
3 education. They breached their duty of care by failing to oversee PCL's compliance with
4 regulations, implementing and enforcing policies that harmed students, allowing PCL to
5 operate in a non-compliant and predatory manner, failing to address Plaintiff's complaints
6 and concerns, making untrue or misleading statements or omissions about the quality and
7 compliance of PCL's legal education program, PCL's fundraising and operating costs, and
8 the State Bar's enforcement of rules and regulations, implementing "underground rules" and
9 failing to follow mandated administrative procedures, failing to adopt or reconcile federal
10 and state unit hour requirements, failing to provide due process in handling Plaintiff's
11 exemption request, and allowing discriminatory practices in law school transfers. This
12 conduct constitutes negligence per se as it violated statutes, regulations, and rules designed
13 to protect individuals like Plaintiff from the harm suffered. As a direct and proximate result
14 of their negligence and negligence per se, Plaintiff suffered damages.

17 **205. Defendants breached their duty of care by:**

- 18 a. Failing to provide accurate and timely transcripts to Plaintiff. (See Exhibit 201A,
19 previously filed accompanying a request for judicial notice at ECF 102, p. 10, 37)
20 b. Failing to award a degree despite Plaintiff's completion of the program requirements.
21 c. Failing to maintain accurate records or provide access to them. (*Id.* at 10, 37)
22 d. Failing to adhere to student solicitation, recruitment, and matriculation standards.
23 (*Id.* at 10)
24 e. Failing to oversee PCL's compliance with regulations or implementing or enforcing
25 policies that harmed students, such as the "non-interference" policy. (*Id.* at 2)
26
27
28

- f. Allowing, facilitating, or encouraging PCL to operate in a non-compliant and predatory manner by conduct including failing to address Plaintiff's complaints and concerns. (*Id.* at 2)
- g. Making untrue or misleading statements about the quality and compliance of PCL's legal education program, PCL's fundraising and operating costs, students and the State Bar's enforcement of rules and regulations. (*Id.* at 9-10, 13-14, 20, 40-41)
- h. Failing to use tuition and donations for their intended purposes. (*Id.* at 13-14)
- i. Failing to provide an accounting of funds after lawful demands. (*Id.* at 13-14)
- j. Implementing "underground rules" and failing to follow mandated administrative procedures. (*Id.* at 9)
- k. Failing to adopt or reconcile federal or state unit hour requirements. (*Id.* at 31)
- l. No due process in handling Plaintiff's exemption request. (*Id.* at 6-7)
- m. Allowing discriminatory practices in law school transfers. (*Id.* at 62)
- n. Retaliating against Plaintiff for exercising his First Amendment right to free speech. (*Id.* at 44)

206. The State Bar's inspection report in 2020 identified numerous instances of PCL's non-compliance with educational standards, including inaccurate record-keeping and inadequate policies and procedures. Despite this knowledge, the State Bar's directors, officers, agents, and employees acting in their individual capacities failed to take timely and effective action to protect students from the harm caused by PCL's probable negligence, likely constituting negligence per se. The State Bar defendants in their individual capacities failure to take action against Spiro and Leonard, despite being aware of the serious allegations outlined in the Sitton Letter (Exhibit 5), likely constitutes negligence and a

1 breach of their fiduciary duty to protect the public. The State Bar's inaction allowed Spiro
2 and Leonard to continue their alleged misconduct, directly harming Todd and others.

3 207. Defendants' conduct, as described above, constitutes negligence per se as it violated
4 statutes, regulations, and rules designed to protect individuals like Plaintiff from the harm
5 suffered.

6 208. Plaintiff's harm is directly traceable to these negligent actions, as the policies and
7 practices of Defendants mirror those found unconstitutional in *Keyes v. School District No.*
8 *1, Denver, Colo.*, where similar failures in oversight and discriminatory practices led to
9 systemic educational inequality.
10

11 209. As a direct and proximate result of Defendants' negligence and negligence per se,
12 Plaintiff suffered economic damages, including but not limited to past and future lost wages,
13 tuition and fees paid to PCL, and other out-of-pocket costs. Plaintiff also suffered non-
14 economic damages, including emotional distress, pain and suffering, loss of enjoyment of
15 life, and damage to reputation.
16

17 **– FOURTH CAUSE OF ACTION –**

18 **CLAIM FOR NEGLIGENT HIRING, RETENTION, AND SUPERVISION**
19 **(Against the Peoples College of Law, The Board of Directors, Officers, and Agents of**
20 **Peoples College of Law, Spiro, Pena, Gillens, Silberger, Zuniga, Aramayo)**

21 210. Summary: This cause of action alleges that the Peoples College of Law (PCL), the
22 and individual agents, employees, directors and officers of the organizations breached their
23 respective duties of care by negligently hiring, retaining, and supervising their employees
24 and agents. This negligence resulted in these individuals acting outside the scope of their
25 employment or in violation of established laws and regulations, causing harm to the Plaintiff
26 and other similarly situated students. The failure of both the entities and directors, officers
27 and agents to adequately train, supervise, and monitor their personnel enabled them to
28

engage in misconduct, including discriminatory practices, failure to enforce regulations, and obstructionist conduct, thereby causing and contributing to Plaintiff's harm.

- i. Plaintiff hereby re-alleges and incorporates by reference each allegation contained in ¶¶ 35-210, with particular emphasis on the allegations of discriminatory policies and practices, failure to enforce regulations, negligent management of educational programs, improper hiring and retention of individuals known to engage in wrongful conduct, and inadequate training and supervision of personnel (see ¶¶ 15-37, 54-60, 69-76, 102-120).
- ii. Exhibits 1, 2, 3, 5, 6, and 201A: Providing evidence of inaccurate transcripts, the State Bar's reports of PCL's non-compliance, communications between parties, and the State Bar's inspection report, further supporting the various causes of action.

PCL's Negligent Hiring, Retention, and Supervision

211. PCL's negligent management of its educational programs, including maintaining inaccurate records, failing to provide necessary courses, and collecting unlawful fees, resulted in foreseeable harm to Plaintiff. Despite receiving notice of these issues through formal complaints and documented reports, PCL continued these practices without correction, directly impacting Plaintiff's educational progress and ability to transfer or graduate.

212. 148. Harm Caused by Non-Compliance:

213. Because of Defendants' conduct and willful non-compliance, Plaintiff was prevented from completing his legal education and obtaining his degree. This denial of educational opportunities caused Plaintiff financial and emotional harm, as well as impairment of his professional advancement.

214. Duty to Hire or Employ Agents Who Comply with Law:

1 215. PCL had a duty to hire or engage only those professors, deans, directors, agents, or
2 officers who would comply with the law and had a duty to properly train and supervise all to
3 ensure that they did so.

4 216. Defendants knew or should have known that their policies and actions were unlawful
5 or that their application would inevitably result in unlawful consequences. PCL agents,
6 directors, officers, and administrators had a duty to ensure employment or appointment as
7 agents those who would in good faith exercise reasonable judgement and effort to maintain
8 compliance with state statutes and State Bar regulations. As a regulated entity, PCL was
9 obligated to operate lawfully and ethically. The individual defendants, as officers and
10 employees of PCL, were responsible for upholding their professional and ethical obligations
11 and utilizing others who would do the same. (Id. at 9)

12 217. PCL breached that duty by hiring or continuously engaging Gonzalez, Pena, Spiro,
13 Sarinana, Sarin, Bouffard, Gillens, Franco, Sanchez, Torres, Deupree, Silbiger, Pomposo,
14 Zuniga, Aramayo, Maestas, and Venegas and then by failing to properly train and supervise
15 them, PCL allowed these individuals to operate in continual and egregious noncompliance
16 and discriminate against Plaintiff in retaliation for his efforts to correct the issues internally
17 and via external requests for assistance to the State Bar.

18 218. As a proximate result of PCL's breach of duty, Plaintiff was injured, in amounts to be
19 proven at trial.

20 **REMEDIES & RELIEF REQUESTED**

21 219. Plaintiff re-alleges and incorporates by reference all prior allegations contained in
22 ¶¶ 1-220, insofar as they establish the Defendants' liability and the Plaintiff's entitlement
23 to the remedies sought herein.

1 220. Todd did not receive an accurate transcript or degree after completion of the
2 curriculum and is owed money.

3 220A. As of the date of this filing, Plaintiff continues to experience ongoing harm. He has
4 not been issued an accurate or complete transcript, has been denied access to his own academic
5 file, and remains unable to fully complete bar licensure processes. These harms are directly
6 traceable to Defendants' acts and omissions and are continuing in nature, not limited to a fixed
7 historical event.
8

9
10 **A. Monetary Relief**

11 221. Compensatory damages in an amount to be proven at trial against all Defendants,
12 jointly and severally, for the harm caused by their conduct as described in the First through
13 Eighth Causes of Action.

14 222. Treble damages, totaling \$750,000.00, as allowed by Civil Code section 52(a)
15 against eligible Defendants, jointly and severally, for the harm caused by their conduct as
16 described in the Seventh Cause of Action.

17 223. Punitive damages against eligible Defendants, jointly and severally, to punish them
18 for their malicious and willful misconduct and to deter similar conduct in the future.
19

20 **B. Declaratory Relief**

21 224. A declaration that PCL's practices, as described in this Complaint, violate the Unruh
22 Civil Rights Act and the California Business and Professions Code.
23

24 **C. Injunctive Relief**

25 225. The Plaintiff respectfully requests that the Court order the Defendants to issue a
26 public statement acknowledging their wrongdoing and offering a sincere apology to the
27 Plaintiff and all other students who have been adversely affected by their actions and
28

1 inactions. Such a statement should explicitly recognize the harm caused by the Defendants'
2 conduct and express a commitment to rectifying the systemic issues that allowed such harm
3 to occur.

4 226. The Plaintiff further requests that the Court order the Defendants to establish a
5 restitution fund to compensate all students who have suffered financial or other losses as a
6 result of the Defendants' conduct. The fund should be administered by an independent third
7 party and provide adequate compensation for tuition, fees, lost wages, and other damages
8 incurred by the affected students.

9
10 227. A permanent injunction ordering PCL to:

- 11 i. Cease all operations and dissolve as a corporation under Corporations Code
12 section § 6518.
13
14 ii. Refund all tuition and fees paid by Plaintiff.

15 **D. Other Relief**

- 16 i. An order directing PCL to provide Plaintiff with an accurate, complete, and
17 official transcript reflecting all coursework and grades earned, and to confer upon
18 Plaintiff a Juris Doctorate degree.
19

20 **E. Additional Remedies**

- 21 i. Civil penalties under Business and Professions Code sections §§ 17206, 17206.1,
22 and 17536 for violating the Business and Professions Code as proven at trial.
23
24 ii. The permanent removal of Defendants under Corporations Code section § 5223 as
25 the Court deems appropriate.
26
27 iii. A declaration of Plaintiff's "good faith" indemnification.
28
iv. Plaintiff's costs of suit and other costs under Government Code section § 12598.

1 v. A statement of determination of PCL's Board Election Validity under California
2 Corporations Code section § 5716.

3 vi. Any other relief that the Court deems just and equitable.
4
5

6 **PLAINTIFF TODD HILL VERIFIES THE TRUTH AND BELIEF IN THE TRUTH OF**
7 **THOSE MATTERS DESCRIBED "UNDER PENALTY OF PERJURY" AND THEREFORE**
8 **THIS COMPLAINT IS DEEMED VERIFIED UNDER THE PROVISIONS OF CODE OF**
CIVIL PROCEDURE SECTION 446.

9 Dated: ~~March 31~~ May 22, 2025
10

11 Respectfully submitted,

12 
13
14

15 Todd R. G. Hill
16 Pro Se Litigant
17
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Plaintiff's Proof of Service

This section confirms that all necessary documents will be properly served pursuant to L.R. 5-3.2.1

Service. This document will be/has been electronically filed. The electronic filing of a document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by F.R.Civ.P. 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.

~~March 31~~ May 22, 2025

A handwritten signature in black ink, appearing to read "Todd R. G. Hill", with a horizontal line extending to the right.

Todd R. G. Hill

1 **AffidavitDeclaration of Todd R. G. Hill in Support of the ~~Fourth~~Fifth Amended**
2 **Complaint**

3 I, Todd R. G. Hill, being duly sworn, depose and state as follows:

4 **PERSONAL BACKGROUND AND ENROLLMENT AT PCL**

- 5
- 6 1. I am over the age of 18, competent to testify, and make this ~~affidavit~~declaration based upon
- 7 my personal knowledge unless otherwise stated.
- 8 2. I am the Plaintiff in the case ~~against~~ Hill v. The Board of Directors, Officers, and Agents and
- 9 Individuals of Peoples College of Law-(PCL), filed, currently pending in the United States
- 10 District Court for the Central District of California, Case No. 2:23-cv-01298-JLS-BFM.
- 11
- 12 3. I am a registered law student with ~~the~~Indiana, Texas and California State Bars. I am
- 13 expected to receive my J.D. from Purdue Law School in 2025.
- 14
- 15 4. I took the February 2025 California Bar Exam.

16 ~~4.5.~~The facts stated in this affidavit are true and correct to the best of my knowledge and belief.

17 **BACKGROUND**

18

19 ~~5.6.~~I was enrolled as a student at Peoples College of Law (PCL) and completed the required

20 coursework for my degree.

21

22 ~~6.7.~~PCL officials, including Ira Spiro and Christina Gonzalez, have engaged in various acts of

23 misconduct, including but not limited to: a. Manipulating academic records and transcripts;

24 b. Denying access to courses necessary for completion of the program; c. Implementing

25 policies that obstructed my educational progress; d. Retaliating against me for

26 whistleblowing about procedural deficiencies and fraud; e. Engaging in discriminatory

27

28

1 practices, including preferential treatment of other students such as Nancy Popp, while
2 denying me comparable accommodations.

3
4 7.8. PCL's misconduct has caused me significant harm, including delayed certification,
5 reputational damage, emotional distress, and substantial financial losses associated with my
6 efforts to rectify their misconduct or consequences.

7
8 **RICO ALLEGATIONS & RELATED MISCONDUCT**

9 8.9. ~~Since Beginning in~~ 2020, I ~~have repeatedly requested~~ made repeated requests for
10 accurate ~~transcripts and~~ academic records ~~from PCL, specifically~~ and transcripts, including
11 through email Gmail communications ~~using my Gmail account (e.g.,~~
12 ~~toddryangregoryhill@gmail.com).~~ On multiple occasions, I have paid transcript fees to receive
13 inaccurate transcripts multiple times but received documents that omitted or misrepresented my
14 academic record..

15
16 9.10. PCL officials, including Ira Spiro, Adriana Zuniga and Roger Aramayo, have
17 provided inaccurate transcripts on multiple occasions. For example, on or about June 15, 2022, I
18 received a transcript from Ira Spiro via email, which falsely stated that I had not completed
19 certain courses despite my submission of documentation proving completion. Transcripts have
20 also included fractional unit awards without adequate basis, hearing or process.

21 10.11. I have also received communications via Gmail from PCL officials, including Roger
22 Aramayo, that contained misleading statements about my academic standing. For instance, on
23 October 14, 2023, Aramayo stated via email that the institution was unable to provide accurate
24 transcripts due to administrative delays, despite having been provided with proof of course
25 completion months earlier.
26
27
28

1 ~~11.12.~~ I have preserved copies of these email communications, which demonstrate
2 intentional efforts by PCL officials to obscure or falsify my academic progress and a consistent
3 pattern of misinformation and delay that obstructed my access to graduation and licensure.

4 ~~12.13.~~ Additionally, PCL officials have repeatedly failed to correct errors in my transcripts
5 even after acknowledging mistakes. Although I completed the totality of the required
6 coursework for issuance of a degree, I was not issued a degree.

7
8 ~~13.14.~~ PCL's failure to correct transcripts has materially impaired my ability to apply for
9 certification with the California State Bar and forced me to complete two years of additional
10 coursework at another institution at great personal and professional cost. Despite submitting
11 completed coursework and proof of compliance, I was unable to obtain the necessary
12 certifications to timely proceed.

13
14 ~~14.15.~~ As a result of these actions, I have suffered financial losses exceeding \$250,000 in
15 tuition payments, lost work opportunity, reputational harm, and significant emotional distress
16 from being unjustly obstructed from completing my legal education.

17 ~~15.16.~~ These actions form part of a continuous pattern of fraudulent conduct involving wire
18 and mail communications to deny me access to the benefits and opportunities I am entitled to
19 receive.

20
21 ~~16.17.~~ I have attached copies of relevant emails and transcripts demonstrating the specific
22 instances of misconduct described above.

23 **UNRUH CIVIL RIGHTS ACT VIOLATIONS**

24
25 ~~17.18.~~ I have been subjected to discriminatory treatment by PCL on the basis of my race
26 and protected advocacy, which violates the Unruh Civil Rights Act, California Civil Code §
27 51.
28

1 ~~18.~~19. Specific instances of discriminatory conduct include:

- 2 a. Refusal and failure to correct erroneous transcripts despite my repeated requests;
- 3
- 4 b. Arbitrarily denying me access to courses necessary for graduation;
- 5
- 6 c. Retaliating against me for attempting to address these issues and for exercising my rights
- 7 as a whistleblower.

8 ~~19.~~20. Other students, including Nancy Popp, were promptly provided with corrections to

9 their transcripts and accommodations that were denied to me.

10

11

12 **NEGLIGENCE AND NEGLIGENCE PER SE**

13

14 ~~20.~~21. PCL and its agents failed to exercise reasonable care in maintaining accurate

15 academic records, providing required courses, and enforcing compliance with relevant

16 regulations.

17 ~~21.~~22. PCL's violations of statutory and regulatory standards contributed directly to my

18 harm.

19

20 ~~22.~~23. PCL's negligent conduct included: a. Issuing erroneous transcripts; b. Refusing to

21 recognize my completion of coursework despite documentation; c. Implementing policies

22 that unjustly obstructed my educational progress.

23

24 ~~23.~~24. PCL's charter was involuntarily revoked, effective May 31, 2024, which I believe is

25 a result that I reasonably believe would not have occurred in the absence of protracted

26 negligence or willful misconduct.

27

28 **NEGLIGENT HIRING, RETENTION, AND SUPERVISION**

1 24.25. PCL failed to adequately hire, train, supervise, and monitor its personnel, allowing
2 discriminatory and retaliatory practices to occur unchecked.

3
4 25.26. I believe PCL had a duty to hire, supervise, and train its agents in a manner that
5 ensured their conduct conformed to institutional policies and applicable regulations. If
6 agents failed to comply, PCL was responsible for retraining them or terminating their
7 employment or engagement when necessary to maintain a lawful and compliant educational
8 environment.

9
10 26.27. PCL's failure to properly supervise its agents contributed directly to the harm I have
11 suffered.

12 27.28. The failure to provide me with the fourth year of study as required by its own
13 policies further demonstrates negligent oversight.

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15 28.29. PCL's negligence in hiring, retention, and supervision allowed employees and agents
16 to engage in misconduct that harmed me.

17 ~~FURTHER AFFIANT SAYETH NOT.~~

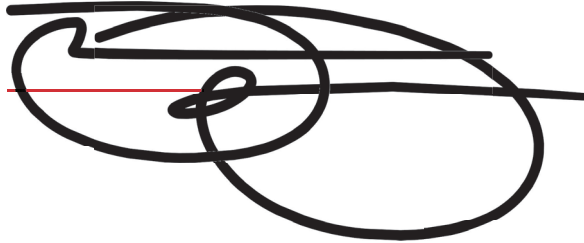
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19 ~~I declare under penalty of perjury under the laws of the State of California that the foregoing is true~~
20 ~~and correct.~~

21
22 **CLARIFICATION REGARDING STATE BAR OFFICIALS**

23 30. Plaintiff does not assert claims in the Proposed Fifth Amended Complaint against Natalie
24 Leonard, Audrey Ching, Leah Wilson, or other personnel of the State Bar of California, in
25 any capacity. These individuals were previously named as defendants but were dismissed
26 with prejudice in connection with the Fourth Amended Complaint. While Plaintiff's Rule
27 59(e) motion remains pending, no claims are presently asserted against these individuals in
28

1 this pleading. Any references to them herein are included solely for factual context relating
2 to regulatory oversight, institutional posture, and the procedural record relevant to the
3 allegations against other parties. Plaintiff does not seek to reinstate liability against these
4 individuals through this amendment. I declare under penalty of perjury under the laws of the
5 State of California that the foregoing is true and correct.
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7 Executed on this ~~31st~~ 22nd day of ~~March~~ May 2025, at Belton, Texas.

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12 Todd R. G. Hill
13 Plaintiff, Pro Se Litigant
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TABLE OF EXHIBITS

1. Exhibit 1: Spiro Letter and Transcripts

Contains correspondence from Ira Spiro to Todd Hill, along with transcripts provided by PCL. The transcripts show material errors, including incorrect unit allocations and missing required information. Spiro's communications fail to address these discrepancies despite multiple requests for correction.

2. Exhibit 2: Popp Grievance Letter and 2020 Progress Report

Includes a formal grievance letter submitted by Nancy Popp to the PCL Board detailing inaccurate grading, lack of transparency in governance, and substandard instruction violating State Bar guidelines. Also includes a 2020 progress report by State Bar to PCL highlighting areas of non-compliance and failed attempts to remedy deficiencies.

3. Exhibit 3: Profiles in Outcomes Report

A 2023 State Bar report titled "Profiling the Outcomes of the FYLSX" which details disparities in bar passage rates across racial demographics. This report demonstrates that prolonged education timelines significantly reduce the likelihood of bar passage for African American students, supporting Todd Hill's claims of systemic inequities.

4. Exhibit 4: Email to Viramontes as Faculty Committee Chair Reviewing Student Handbook Changes (11242021)

Correspondence from Kevin Clinton to Viramontes as Faculty Committee Chair addressing proposed changes to the PCL Student Handbook intended to suppress student grievances from reaching the State Bar. This demonstrates PCL's attempts to silence complaints and shield itself from external scrutiny.

1 **5. Exhibit 5: Spiro Exchange - Crediting Pay Against Tuition**

2 Emails between Todd Hill and Ira Spiro regarding an arrangement to credit Hill's work against
3 his tuition fees. The exchange reveals inconsistencies in Spiro's accounting, resulting in breach of
4 contract and overcharges of approximately \$2,400. Hill's efforts to clarify these discrepancies are
5 obstructed by PCL administrators.
6

7 **6. Exhibit 6: Email Exchange from Spiro to State Bar (Leonard)**

8
9 Contains emails from Ira Spiro to Natalie Leonard of the State Bar discussing various issues but
10 omitting known problems of incorrect unit awards on student transcripts. The correspondence
11 demonstrates Spiro's awareness of compliance failures while misrepresenting PCL's operations to
12 the State Bar. This document was produced by the State Bar of California in response to a
13 California Public Records Act (CPRA) request. The relevant underlying facts, as contained within
14 Exhibit C of Plaintiff's Motion to Supplement the Record (ECF 199), were judicially noticed in
15 ECF 248 for the purpose of amending Plaintiff's complaint.
16

17 **7. Exhibit 7: Popp and Bell Election Committee Report**

18
19 A formal report detailing PCL's internal election process and related challenges to Todd Hill's
20 candidacy. The report illustrates irregularities and attempts to invalidate Hill's position on the PCL
21 Board through questionable review processes.

22 **8. Exhibit 8: Donor Call Squad Email (04282021)**

23
24 Exhibit 8 includes a series of emails related to PCL's fundraising activities and internal
25 communications between administrators, including Hector Pena, Ira Spiro, Christina Gonzalez,
26 and David Bouffard. The emails reveal inconsistencies between PCL's public fundraising
27 promises—asserting that “100% of proceeds” would be used for student needs and underserved
28

1 communities—and internal discussions suggesting potential misrepresentation or misuse of
2 those funds. Additionally, the Bouffard emails include statements indicating that David
3 Bouffard acted under the authority of then PCL President Hector Pena to block Todd Hill’s
4 Zoom access, preventing him from attending classes. The emails reflect broader governance
5 issues and suggest retaliatory actions against Hill for his efforts to correct PCL’s administrative
6 deficiencies.
7

8 **9. Exhibit 9: Email exchange between Sarinana and State Bar (Leonard)**

9
10 Correspondence from Sarinana to State Bar addressing ongoing administrative issues at PCL,
11 including discrepancies in grade uploads and transcript management. The email underscores PCL’s
12 persistent non-compliance and administrative failures. This document was produced by the State
13 Bar of California in response to a CPRA request. The relevant underlying facts, as contained within
14 Exhibit C of Plaintiff’s Motion to Supplement the Record (ECF 199), were judicially noticed in
15 ECF 248 for the purpose of amending Plaintiff’s complaint.
16

17 **10. Exhibit 10: Chronological Timeline of PCL Defendants’ Misconduct**

18 A detailed timeline from 2018 to 2024 summarizing key events and allegations involving
19 PCL’s misconduct, administrative failures, retaliatory acts, fraudulent schemes, and regulatory
20 non-compliance. The timeline provides a comprehensive overview of Hill’s grievances and
21 PCL’s pattern of misconduct.
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EXHIBIT 1

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EXHIBIT 9

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EXHIBIT 10